

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 05-10136-RGS
	)	
MARK NUTTER	)	

GOVERNMENT'S SUMMARY OF TESTIMONY TO  
BE OFFERED UNDER FED. R. EVID. 702

The United States of America, by and through Assistant United States Attorneys William H. Connolly and James P. Dowden respectfully submits this summary of expert testimony it expects to elicit at trial and the qualifications of the testifying witnesses.

1. Richard J. Pacheco, Forensic Locksmith

A. Summary of Anticipated Testimony

Richard Pacheco will testify that the overhead door to 161D Mid Tech Drive showed no signs of prying or other indicators of forced entry. He will also testify that both the pedestrian door and pedestrian door jam at 161D Mid Tech Drive showed no signs of being forced open. He will further testify that the lock on the pedestrian entry door to 161D Mid Tech Drive displayed no signs of being forced, pricked or tampered with in a manner that would be consistent with the lock being bypassed. Moreover, he will testify that the key to said lock worked smoothly and freely and that the key both entered and could be removed from the lock

without restriction or hesitation.

B. Qualifications and Basis for Opinion

Richard Pacheco's qualifications are attached at Exhibit A.

2. Trooper Patricia Beehan, Massachusetts State Police

A. Summary of Anticipated Testimony

Trooper Beehan will testify as an expert in latent fingerprint identification. She will testify that following the fire at 161D Mid Tech Drive, she examined (1) the five red plastic gas containers found in the unit, (2) the note that was left on the exterior mailbox to the unit, and (3) the business card that Defendant Mark Nutter retrieved from his home following the fire. She will testify that there was insufficient fingerprint ridge detail on all of these items to permit a comparison with the known fingerprints of any individual.

B. Qualifications and Basis for Opinion

Trooper Beehan is a twenty-one (21) year veteran of the Massachusetts State Police. She has served as a crime scene investigator for thirteen (13) years. Trooper Beehan has received basic and advanced training from the Federal Bureau of Investigation in both finger printing and palm printing. She has also received training on the job in fingerprint identification from crime scene investigations.

During her years with the Massachusetts State Police, Trooper Beehan has investigated close to 1000 crime scenes,

including scenes involving fingerprints. She has been qualified and has testified as a fingerprint identification expert in Norfolk, Barnstable, Bristol and Plymouth Superior Courts.

3. Sergeant Paul Letsche, Massachusetts State Police

A. Summary of Anticipated Testimony

Trooper Letsche will testify consistent with his report in Case No. 2003-117-1384. A copy of that report has been provided to defense counsel. In particular, Trooper Letsche will testify as to the origin and cause of the fire at 161D Mid Tech Drive. He will testify that the burn patterns throughout the building are consistent with that of liquid pour patterns. He will opine that the fire was the result of a deliberate act and incendiary in nature. He will further opine that the most probable cause of the fire was an open flame ignition with gasoline that was poured throughout the building. Trooper Letsche will also testify that the burn patterns throughout the unit and on the overhead and pedestrian doors to the building are consistent with these doors being closed during the fire.

B. Qualifications and Bases for Opinions

Sergeant Letsche's qualifications attached at Exhibit B.

4. Trooper Michael S. Mazza, Massachusetts State Police

A. Summary of Anticipated Testimony

Trooper Mazza will testify consistent with his report dated April 14, 2005 as an expert in the origin and cause of fire. A

copy of this report has been previously provided to defense counsel. He will testify as to the numerous K-9 alerts for the presence of ignitable liquids in the first floor interior workspace of 161D Mid Tech Drive and the second floor office. He will further testify as to the presence of gas containers in the both the first floor and second floor office area. Trooper Mazza will opine that the fire was the result of a deliberate act and incendiary in nature. He will also opine that the most probable cause of the fire was an open flame ignition with gasoline that was poured throughout the building. It is further anticipated that Trooper Mazza will also testify that the burn patterns throughout the unit and on the overhead and pedestrian doors to the building are consistent with these doors being closed during the fire.

B. Qualifications and Basis for Opinions

Trooper Mazza's qualifications attached at Exhibit C.

5. John E. Drugan, Senior Chemist, Massachusetts State Police

A. Summary of Anticipated Testimony

John Drugan will testify consistent with his report dated November 28, 2003. A copy of this report has been provided to defense counsel. Mr. Drugan will testify as to the chemical analysis he performed on the three samples taken from the interior of 161D Mid Tech Drive following the fire. He will testify that each of these samples tested positive for the

presence of #2 fuel oil (diesel fuel) - a common ignitable liquid and fire accelerant.

B. Qualifications and Basis for Opinions

Mr. Drugan's qualifications attached at Exhibit D.

5. Paul Mahoney, Insurance Investigator

A. Summary of Anticipated Testimony

Mr. Mahoney will testify as an expert as to the origin and cause of the fire at 161D Mid Tech Drive. He will testify that the fire was incendiary in nature and intentionally set. He is further expected to testify that the burn patterns throughout the unit and on the overhead and pedestrian doors to the building are consistent with these doors being closed during the fire. Mr. Mahoney is also expected to testify that the pedestrian door at 161D Mid Tech Drive showed no signs of being forced open. He will further testify that the lock on the door displayed no signs of being forced, pricked or tampered with in a manner that would be consistent with the lock being bypassed. Moreover, he will testify that the key to said lock worked smoothly and freely and that the key both entered and could be removed from the lock without restriction or hesitation

B. Qualifications and Basis for Opinions

A copy of Mr. Mahoney's CV will be forwarded to counsel for the defendant and the Court when it is received.

Respectfully submitted,

Michael J. Sullivan  
United States Attorney

Date: November 6, 2007

By: /s/ James P. Dowden  
WILLIAM H. CONNOLLY  
JAMES P. DOWDEN  
Assistant U.S. Attorneys  
(617) 748-3800

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on November 6, 2007.

/s/ James P. Dowden

James P. Dowden  
Assistant U.S. Attorney

**EXHIBIT A**



**North Eastern Technical Services, Inc.**  
**PO Box 5150**  
**Fall River MA 02723**

**Richard J. Pacheco**

**Court Appearances**

Date: June 6, Sept. 24, Oct. 31, 1991  
Parties: Louis Norris v. Royal Insurance  
Court: Lawrence District Court, Lawrence MA  
Client: Royal Insurance, Defendant

Date: Dec. 18, 1991, Feb. 18 & 19, 1992  
Parties: Paul Flanagan v. Commerce Insurance  
Court: Boston Municipal court, Boston MA  
Client: Commerce Insurance, Defendant

Date: Jan. 20 & 27, 1992  
Parties: Cristanto Mendonca v. Travelers Insurance  
Court: Deposition, Cambridge MA  
Client: Travelers Insurance, Defendant

Date: Jan. 24, 1992  
Parties: Commonwealth of Massachusetts v. Salvatore Presti  
Court: Brockton District Court, Brockton MA  
Client: Commonwealth of MA, Prosecutors

Date: March 2, 1992  
Parties: Commonwealth of Massachusetts v. Robert Drew  
Court: Fall River MA  
Client: Commonwealth of MA, Prosecutors

Date: March 17, 1992  
Parties: Louis Curvelo v. Travelers Insurance  
Court: New Bedford District Court, New Bedford MA  
Client: Travelers Insurance, Defendant

Date: March 17, 1992  
Parties: Talbot v. American Universal Insurance  
Court: New Bedford District Court, New Bedford MA  
Client: American Universal Insurance, Defendant

Date: March 19, 1992  
Parties: Francisca Delacruz v. Royal Insurance  
Court: Lawrence District Court, Lawrence MA  
Client: Royal Insurance, Defendant

Date: June 2, 1992, Nov. 16, 1993  
Parties: Dennis Harkins v. National Grange Mutual  
Court: Boston Municipal Court, Boston MA  
Client: National Grange Mutual, Defendant

Date: June 3, 1992  
Parties: Heather Lyle v. National Grange Mutual  
Court: Boston Municipal Court, Boston MA  
Client: National Grange Mutual, Defendant

Date: June 26, 1992  
Parties: Anthony Costello v. Metropolitan Insurance  
Court: Stoughton District Court, Stoughton MA  
Client: Metropolitan Insurance, Defendant

Date: July 17, 1992  
Parties: Ad-On v. Travelers Insurance  
Court: Malden District Court, Malden MA  
Client: Travelers Insurance, Defendant

Date: Aug. 6, and Sept. 1, 1992  
Parties: Dennis Doiron v. Royal Insurance  
Court: Lawrence District Court, Lawrence MA  
Client: Royal Insurance, Defendant

Date: Aug. 13, 1992  
Parties: F. L. Roberts v. CIGNA  
Court: Springfield District Court, Springfield MA  
Client: CIGNA, defendant

Date: Oct. 1, 1992  
Parties: Paul R. Poirier v. Travelers Insurance  
Court: New Bedford District Court, New Bedford MA  
Client: Travelers Insurance, Defendant

Date: Oct. 22, 1992  
Parties: Brian Murkland v. Metropolitan Insurance  
Court: Clinton District Court, Clinton MA  
Client: Metropolitan Insurance, Defendant

Date: Jan. 7, 1993  
Parties: Joseph Zucco v. Commerce Insurance  
Court: Boston Municipal Court, Boston MA  
Client: Commerce Insurance, Defendant

Date: Feb. 4, 1993  
Parties: Alfred Bealieu v. Royal Insurance  
Court: Lowell Superior Court, Lowell MA  
Client: Royal Insurance, Defendant

Date: Feb. 26, 1993  
Parties: Erik Rutch v. Aetna Insurance  
Court: New Bedford MA  
Client: Aetna Insurance, Defendant

Date: March 3, 1993  
Parties: Antonio Jacob v. Hanover Insurance  
Court: Bristol County Superior Court, Fall River MA  
Client: Hanover Insurance, Defendant

Date: March 10, 1993  
Parties: John Heywood Jr. v. Aetna Insurance  
Court: Fall River MA  
Client: Aetna Insurance, Defendant

Date: March 23, 1993  
Parties: Robert J. Adams v. State Farm Insurance  
Court: Philadelphia PA  
Client: State Farm Insurance, Defendant

Date: April 13, 1993  
Parties: Leslie & Cynthia Mewbourn v. Owners Insurance  
Court: Cleveland OH  
Client: Owner's Insurance, Defendant

Date: April 19, 1993  
Parties: Diane Kahler v. State Farm Insurance  
Court: Allentown PA  
Client: State Farm Insurance, Defendant

Date: May 11, 1993  
Parties: John Kandrallyan v. Royal Insurance  
Court: Boston Municipal Court, Boston MA  
Client: Royal Insurance, Defendant

Date: May 14, 1993  
Parties: Iva McGowan v. State Farm Insurance  
Court: Chattanooga TN  
Client: State Farm Insurance, Defendant

Date: May 21, 1993  
Parties: Lucille Schultz v. State Farm Insurance  
Court: Deposition, Memphis TN  
Client: State Farm Insurance, Defendant

Date: July 27 and Sept. 16, 1993  
Parties: Robert Taylor v. Worcester Insurance  
Court: Dedham District Court, Dedham MA  
Client: Worcester Insurance, Defendant

Date: Sept. 22, 1993  
Parties: Lucille Schultz v. State Farm Insurance  
Court: Memphis TN  
Client: State Farm Insurance, Defendant

Date: Oct. 13, 1993  
Parties: Anildo Rosa v. Kemper Insurance  
Court: Suffolk Superior Court, Boston MA  
Client: Kemper Insurance, Defendant

Date: Oct. 25, 1993  
Parties: Gary McMillan v. Aetna Insurance  
Court: Lynn District Court, Lynn MA  
Client: Aetna Insurance, Defendant

Date: Dec. 14, 1993  
Parties: Robert Bastis Jr. v. Amica Insurance  
Court: Stoughton MA  
Client: Amica Insurance, Defendant

Date: Dec. 15, 1993 and April 1, 1994  
Parties: Francis Cassidy v. CIGNA  
Court: Malden MA  
Client: CIGNA, Defendant

Date: Jan. 13, 1994  
Parties: G&G Auto Body v. Progressive Insurance  
Court: Deposition, Milburn NJ  
Client: Progressive Insurance, Defendant

Date: Feb. 15, 1994  
Parties: Abramison v. State Farm Insurance  
Court: Philadelphia PA  
Client: State Farm Insurance, Defendant

Date: March 11, 1994  
Parties: Frank P. Umana v. Safety Insurance  
Court: Deposition, Boston MA  
Client: Frank P. Umana, Plaintiff

Date: April 22, 1994  
Parties: G&G Auto Body v. Progressive Insurance  
Court: Deposition, Newark NJ  
Client: Progressive Insurance, Defendant

Date: May 11, 1994  
Parties: Ludvigson v. Metropolitan Insurance  
Court: Worcester Superior Court, Worcester MA  
Client: Metropolitan Insurance, Defendant

Date: May 31, 1994  
Parties: Deborah Talbot v. Hanover Insurance  
Court: New Bedford District Court, New Bedford MA  
Client: Hanover Insurance, Defendant

Date: July 8, 1994  
Parties: Sandra Vincent v. Pawtucket Mutual Insurance  
Court: Providence RI  
Client: Pawtucket Mutual Insurance, Defendant

Date: July 15, 1994  
Parties: Jose & Maria Duarte v. Commerce Insurance  
Court: Fall River District Court, Fall River MA  
Client: Commerce Insurance, Defendant

Date: July 21, 1994  
Parties: Todd Groman v. Hanover Insurance  
Court: Brookline MA  
Client: Hanover Insurance, Defendant

Date: Sept. 7, 1994  
Parties: Russell Dunkle v. Allstate Insurance  
Court: Nashville TN  
Client: Allstate Insurance, Defendant

Date: Sept. 15, 1994  
Parties: State Farm Insurance v. Robert J. Adams  
Court: Philadelphia PA  
Client: State Farm Insurance, Plaintiff

Date: Nov. 15, 1994  
Parties: Alberto Gomes v CIGNA  
Court: Stoughton District Court, Stoughton MA  
Client: CIGNA, Defendant

Date: Dec. 14, 1994  
Parties: Dewitt M. Brooks v. Allstate Insurance  
Court: Nashville TN  
Client: Allstate Insurance, Defendant

Date: Jan. 4, 1995  
Parties:  
Court: Deposition, Kansas City MO  
Client: Metropolitan Insurance

Date: Jan. 13, 1995, May 5, 1995  
Parties: David Higgins v. Commercial Union Insurance  
Court: Wareham District Court, Wareham MA  
Client: Commercial Union Insurance, Defendant

Date: Jan. 18, 1995  
Parties: Rick Rizzo v. Progressive Insurance  
Court: Cleveland OH  
Client: Progressive Insurance, Defendant

Date: Feb. 7, 1995  
Parties: Kristopher Brown v. Norfolk & Dedham Insurance  
Court: Stoughton MA  
Client: Norfolk & Dedham Insurance, Defendant

Date: April 7, 1995  
Parties: Jeana Poto v. Aetna Insurance  
Court: Boston MA  
Client: Aetna Insurance, Defendant

Date: July 27, 1995  
Parties: Mia Deangelis v. Borden, Inc. & The Price Chopper, Inc.  
Court: Deposition, Fall River MA  
Client: Borden Ice Cream, Defendant

Date: July 10, 1995  
Parties: James Curtis v. Progressive Insurance  
Court: St. Louis MO  
Client: Progressive Insurance, Defendant

Date: Nov. 9, 1995  
Parties: Mark T. Reed v. American Select Insurance  
Court: Sandusky OH  
Client: American Select Insurance, Defendant

Date: Oct. 30, 1995  
Parties: Carolyn Owen Williams v. Allstate Insurance  
Court: Nashville TN  
Client: Allstate Insurance, Defendant

Date: Nov. 2, 1995  
Parties: Adolphus Bailey v. Allstate Insurance  
Court: Memphis TN  
Client: Allstate Insurance, Defendant

Date: Dec. 7, 1995  
Parties: Fernando Amaral v. Commercial Union Insurance  
Court: New Bedford MA  
Client: Commercial Union Insurance, Defendant

Date: Dec. 28 & 29, 1995  
Parties: Dennis Costa v. Metropolitan Insurance  
Court: New Bedford District Court, New Bedford MA  
Client: Metropolitan Insurance, Defendant

Date: Jan. 18, 1996  
Parties: Randy Zimmerman v. Porsche  
Court: Deposition, Offices of Armstrong, Teasdale, Schafly & Davis  
1 Metropolitan Square, St. Louis MO  
Client: Zimmerman, Plaintiff

Date: Jan. 29, 1996  
Parties: Nina Ford v. Allstate Insurance  
Court: Memphis Circuit Court, Memphis TN  
Client: Allstate Insurance, Defendant

Date: March 7, 1996  
Parties: Nelson Mello v. Arbella Mutual Insurance  
Court: Fall River, MA  
Client: Nelson Mello, Plaintiff (Pro Bono)

Date: March 18, 1996  
Parties: Harold Jones v. Allstate Insurance  
Court: Nashville Circuit Court, Nashville TN  
Client: Allstate Insurance, Defendant

Date: March 25, 1996  
Parties: David Gurien v. Allstate Insurance  
Court: Davidson County Chancery Court, Nashville TN  
Client: Allstate Insurance, Defendant

Date: March 27, 1996  
Parties: State of Ohio v. Douglas Moore  
Court: Lucas County Court of Common Pleas  
Client: State of Ohio, Prosecutor

Date: March 28, 1996  
Parties: State of Ohio v. Rizzo  
Court: Cleveland OH  
Client: State of Ohio, Prosecutor

Date: April 3, 1996  
Parties: Michael Pagan v. Metropolitan Insurance  
Court: Holyoke MA  
Client: Metropolitan Insurance, Defendant

Date: April 22, 1996  
Parties: Moss v. State Farm Insurance  
Court: Union City TN  
Client: State Farm Insurance, Defendant



Date: May 6, 1996  
Parties: Cheryl Dunbar-Houston v. Progressive Specialty Insurance Company and First American National Bank v. Cheryl Dunbar and Progressive Casualty Insurance Company  
Court: Cumberland County Chancery Court, TN  
Client: Progressive Insurance, Defendant

Date: May 13, 1996  
Parties: Guy D. Morgan and Vickie Morgan v. Allstate Insurance  
Court: Green County Chancery Court, TN  
Client: Allstate Insurance, Defendant

Date: May 21, 1996  
Parties: WAL v. Sears, Roebuck  
Court: Suffolk County Superior Court, Boston MA  
Client: WAL, Plaintiff

Date: Sept. 10, 1996  
Parties: Angie Earvin v. Allstate Insurance  
Court: Memphis TN  
Client: Allstate Insurance, Defendant

Date: Nov. 1, 1996  
Parties: Stephen & Barbara Femino v. American Safewater Systems  
Court: Arbitration, Lincoln RI  
Client: Stephen & Barbara Femino, Plaintiffs

Date: Dec. 17, 1996  
Parties: Cheryl Dunbar-Houston v. Progressive Insurance  
Court: Crossville TN  
Client: Progressive Insurance, Defendant

Date: Jan. 14, 1997  
Parties: William Webb v. State Farm Insurance  
Court: Division 6 Circuit Court, Memphis TN  
Client: State Farm Insurance, Defendant

Date: Jan. 23, 1997  
Parties: Matthew Finacom v. Long Lease  
Court: Natick MA  
Client: Matthew Finacom, Plaintiff

Date: Feb. 24, 1997  
Parties: McAdams v. Allstate Insurance  
Court: Davidson County Circuit Court, Nashville TN  
Client: Allstate Insurance, Defendant



Date: April 7, 1997  
Parties: Steadward v. Commercial Union Insurance  
Court: Chicopee MA  
Client: Commercial Union Insurance, Defendant

Date: April 8, 1997  
Parties: Renee Rosa v. Allstate Insurance  
Court: Nashua NH  
Client: Allstate Insurance, Defendant

Date: June 3, 1997  
Parties: Helen & Crystal Crittenden v. Allstate Insurance  
Court: Morristown TN  
Client: Allstate Insurance, Defendant

Date: June 23, 1997  
Parties: Ronald Neff v. Allstate Insurance  
Court: Blount County, TN  
Client: Allstate Insurance, Defendant

Date: July 28 & 29, 1997  
Parties: Jarman v. Globe American Casualty Co.  
Court: Hamilton County Court of Common Pleas, Cincinnati OH  
Client: Globe American Casualty, Defendant

Date: Aug. 4 & 5, 1997  
Parties: James Grantham v. Allstate Insurance  
Court: Davidson County District Court, Nashville TN  
Client: Allstate Insurance, Defendant

Date: Nov. 18, 1997  
Parties: Demetric Brown v. State Farm Insurance  
Court: Memphis TN  
Client: State Farm Insurance, Defendant

Date: Dec. 3, 1997  
Parties: Lucille Schultz v. State Farm Insurance  
Court: Memphis TN  
Client: State Farm Insurance, Defendant

Date: Dec. 8 & 9, 1997  
Parties: State of California v. Catherine Gaither  
Court: Orange County CA Grand Jury  
Client: State of CA, Prosecutor

Date: Dec. 15, 1997  
Parties: Glen & Linda Miller v. State Farm Insurance  
Court: Murfreesboro TN  
Client: State Farm Insurance, Defendant

Date: April 7, 1998  
Parties: Yolanda Lewis v. Allstate Insurance  
Court: Shelby County Circuit Court, Memphis TN  
Client: Allstate Insurance, Defendant

Date: May 28, 1998  
Parties: Jason Brittich v. GRE Insurance  
Court: Toledo OH  
Client: GRE Insurance, Defendant

Date: June 26, 1998  
Parties: Roman Lysanyak v. Progressive Insurance  
Court: Oklahoma City OK  
Client: Progressive Insurance, Defendant

Date: Sept. 22, 1998  
Parties: Pamela Jordan v. Allstate Insurance  
Court: Shelby County Chancery Court, Memphis TN  
Client: Allstate Insurance, Defendant

Date: Sept. 28, 1998  
Parties: Tyrell Pierce v. Allstate Insurance  
Court: Tipton County Chancery Court, Covington TN  
Client: Allstate Insurance, Defendant

Date: Oct. 12, 1998  
Parties: Clyde Jefferson v. Allstate Insurance  
Court: Memphis TN  
Client: Allstate Insurance, Defendant

Date: Oct. 28, 1998  
Parties: Van Nunnally v. State Farm Insurance  
Court: Richmond VA  
Client: State Farm Insurance, Defendant

Date: Jan. 8, 1999  
Parties: Bridgette Mitchell v. American Family Insurance  
Deposition: NETS Main Office, Fall River MA

Date: Feb. 10, 1999  
Parties: South Carolina Farm Bureau v. Rabon  
Court: Camden, SC  
Client: South Carolina Farm Bureau Insurance, Plaintiff

Date: March 25, 1999  
Parties: Sumner v. State Farm Insurance  
Court: Memphis TN  
Client: State Farm Insurance, Defendant

Date: April 19, 1999  
Parties: Bridgett Heady v. State Farm Insurance  
Deposition: Louisville KY

Date: April 22, 1999  
Parties: Lynn Anderson v. Premier Insurance  
Deposition: Philadelphia PA

Date: August 16, 1999  
Parties: Juan Quevedo v. Globe Adjusting  
Deposition: NETS Main Office, Fall River MA

Date: Sept. 29, 1999  
Parties: Diane Hull v. Allstate Insurance  
Court: Memphis TN  
Client: Allstate Insurance, Defendant

Date: Oct. 1, 1999  
Parties: Therese Stropki v. Progressive Insurance  
Deposition: NETS Main Office, Fall River MA

Date: Nov. 1, 1999  
Parties: David & Elizabeth Wilder v. State Farm Insurance  
Court: Lee County Circuit Court, Jonesville VA  
Client: State Farm Insurance, Defendant

Date: Dec. 7, 1999  
Parties: Leroy James v. State Farm Fire & Casualty  
Court: Hampton Circuit Court, Hampton VA  
Client: State Farm Insurance, Defendant

Date: Dec. 22, 1999  
Parties: Lionel Diaz v. Progressive Insurance  
Deposition: Providence RI

Date: Jan. 7, 2000  
Parties: Willie Wade v. Leader National Insurance  
Deposition: NETS Main Office, Fall River MA

Date: Jan. 11, 2000  
Parties: Ronald Neff v. Allstate Insurance  
Court: Blount County Circuit Court, Maryville TN  
Client: Allstate Insurance, Defendant

Date: Jan. 20, 2000  
Parties: Jerry Wayne King v. Progressive Insurance  
Deposition: NETS Main Office, Fall River MA

Date: Feb. 16, 2000  
Parties: Ralph Maley v. Nationwide Insurance  
Court: Grafton Superior Court, N. Haverhill NH  
Client: Nationwide Insurance, Defendant

Date: Feb. 24, 2000  
Parties: Willie Wade v. Leader National Insurance  
Court: Federal Court, Cleveland OH  
Client: Leader National, Defendant

Date: Feb. 29 & 30, 2000  
Parties: Jerry Wayne King v. Progressive Northwestern Insurance  
Court: Davidson County Chancery Court, Nashville TN  
Client: Progressive Insurance, Defendant

Date: March 9, 2000  
Parties: Billy Pierson v. Allstate Insurance  
Court: Knox County Circuit Court, Knoxville TN  
Client: Allstate Insurance, Defendant

Date: March 15, 2000  
Parties: Jacqueline Chambers v. Leader National Insurance  
Deposition: NETS Main Office, Fall River MA

Date: March 27, 2000  
Parties: Berthil T. James v. Allstate Insurance  
Court: Circuit Court for Prince George's County, Upper Marlboro MD  
Client: Allstate Insurance, Defendant

Date: March 30, 2000  
Parties: Anthony Fair v. GEICO  
Court: District Court, 111 Centre St. New York NY  
Client: GEICO, Defendant

Date: March 31, 2000  
Parties: Richard Thompson v. State Farm Insurance  
Deposition: Louisville KY

Date: May 22, 2000  
Parties: Charmaine Jones v. Allstate Insurance  
Court: Shelby County Circuit Court, Memphis TN  
Client: Allstate Insurance, Defendant

Date: June 2, 2000  
Parties: Princetta Reddix v. State Farm Insurance  
Court: Baton Rouge LA  
Client: State Farm Insurance, Defendant

Date: June 14, 2000  
Parties: Lucille Talley v. Allstate Insurance  
Court: Shelby County Circuit Court, Memphis TN  
Client: Allstate Insurance, Defendant

Date: June 20, 2000  
Parties: Andrel Mallone v. Allstate Insurance  
Court: Davidson County First Circuit Court, Nashville TN  
Client: Allstate Insurance, Defendant

Date: July 10, 2000  
Parties: Richard Stokes v. Allstate Insurance  
Deposition: NETS Main Office, Fall River MA

Date: July 10, 2000  
Parties: James Tharpe v. Allstate Insurance  
Deposition: NETS Main Office, Fall River MA

Date: July 12, 2000  
Parties: Tom Clay v. Omni Insurance  
Deposition: NETS Main Office, Fall River MA

Date: July 31 through Aug. 2, 2000  
Parties: Jerry Wayne King v. Progressive Northwestern Insurance  
Court: Davidson County Chancery Court, Nashville TN  
Client: Progressive Insurance, Defendant

Date: Sept. 26, 2000  
Parties: Louis Gainor v. Metropolitan Insurance  
Deposition: Quincy MA

Date: October 12, 2000  
Parties: Ranford Herman v. GEICO  
Court: District Court, 111 Centre St., New York NY  
Client: GEICO, Defendant

Date: October 13, 2000  
Parties: Miguel Lopez v. Orion Auto Insurance  
Deposition: NETS Main Office, Fall River MA

Date: October 17 & 18, 2000  
Parties: Charles Golden, Sr. v. Permanent General Insurance  
Court: Division 8 of Circuit Court, Memphis TN  
Client: Permanent General Insurance, Defendant

Date: October 27, 2000  
Parties: Kevin Lewis v. Progressive Insurance  
Court: Livonia, MI  
Client: Progressive Insurance, Defendant

Date: Nov. 28, 2000  
Parties: Chau Vu v. Progressive Insurance  
Deposition: NETS Main Office, Fall River MA

Date: January 24, 2001  
Parties: Leah W. Mayo v. Nationwide Mutual Insurance Co.  
Court: Circuit Court for Prince George's County, Upper Marlboro MD  
Client: Nationwide Insurance, Defendant

Date: February 28, 2001  
Parties: Bridget Heady v. State Farm Insurance  
Court: US District Court, Western District of KY (Louisville)  
Client: State Farm Insurance, Defendant

Date: April 3, 2001  
Parties: Jose Ramos v. Allstate Insurance  
Court: Dade County Court, Miami FL  
Client: Allstate Insurance, Defendant

Date: May 7-10, 2001  
Parties: Anatoliy Beshpalov v. Progressive Insurance  
Court: Whatcom County Superior Court, Bellingham WA  
Client: Progressive Insurance, Defendant

Date: May 22, 2001  
Parties: Patrice Cannon v. Allstate Insurance  
Court: Circuit Court Div. 7, Memphis TN  
Client: Allstate Insurance, Defendant

Date: July 23 & 24, 2001  
Parties: United States of America v. Elias DeLaRosa  
Location: United States District Court, Bridgeport CT  
Client: United States / FBI

Date: Sept. 28, 2001  
Parties: Taurus Perkins v. Allstate Insurance  
Deposition: NETS Main Office, Fall River MA

Date: Oct. 19, 2001  
Parties: Jennifer Jackson v. BMW  
Deposition: Boston MA

Date: December 11, 2001  
Parties: John Pendergrass v. Allstate Insurance  
Court: Circuit Court for Prince George's County, Upper Marlboro MD  
Client: Allstate Insurance, Defendant

Date: January 7, 2002  
Parties: Atlanta Casualty Company v. Kevin Williams and Thirkell Williams  
Court: Circuit Court of Tennessee, Thirtieth Judicial District, Memphis TN  
Client: Atlanta Casualty Insurance, Plaintiff

Date: February 10, 2002  
Parties: Taurus Orlando Perkins v. Allstate Insurance  
Court: Shelby County Circuit Court, Memphis TN  
Client: Allstate Insurance, Defendant

Date: July 23, 2002  
Parties: Kristie Dodd v. Oklahoma Farm Bureau Insurance  
Deposition: Providence RI

Date: September 6, 2002  
Parties: Dinh Ho v. State Farm  
Court: St. Martin Parish (St. Martinville) LA  
Client: State Farm Insurance, Defendant

Date: October 21, 2002  
Parties: Sean Grebinger v. State Farm Insurance  
Court: LaFayette Parish, Lafayette LA  
Client: State Farm Insurance, Defendant

Date: November 25, 2002  
Parties: Buck v. AA Discount  
Deposition: Summit NJ

Date: December 2, 2002  
Parties: Charles Hammett v. Farmers Insurance  
Deposition: NETS Main Office, Fall River MA

Date: April 4, 2003  
Parties: Shirley Perry v. Allstate Insurance  
Deposition: NETS Main Office, Fall River MA

Date: April 10, 2003  
Parties: Shena Morrison v. Pride Mobility  
Deposition: NETS Main Office, Fall River MA

Date: June 2-4, 2003  
Parties: Rachelle Daniel v. Nationwide Insurance  
Court: Circuit Court of Shelby County (Memphis) TN Div 5  
Client: Nationwide Insurance, Defendant

Date: July 9, 2003  
Parties: Tomasa Brillante v. Unitrin Direct Insurance  
Deposition: Orlando FL



Date: July 16, 2003  
Parties: State of NH v Morrison and Vallieres  
Court: Grafton County Superior Court, N. Haverhill NH  
Client: State of NH, Prosecutors

Date: September 17, 2003  
Parties: Allstate Insurance v. Sherry Bradford & Marshall Bradford  
Court: Rutherford County Circuit Court, Murfreesboro TN  
Client: Allstate Insurance, Plaintiff

Date: October 3, 2003  
Parties: Brian Redmond v. Atlanta Casualty  
Deposition: NETS Main Office, Fall River MA

Date: October 27, 2003  
Parties: Maria Franco v. Permanent General Insurance  
Deposition: Los Angeles CA

Date: November 20, 2003  
Parties: Myerscough v. Pride Mobility  
Deposition: Chicago IL

Date: December 1 & 2, 2003  
Parties: Antone Coburn v. Allstate Insurance  
Court: Division 6, Memphis TN  
Client: Allstate Insurance, Defendant

Date: May 25, 2004  
Parties: United States of America v. Lawanda Nall  
Court: Pensacola, FL  
Client: United States/ FBI, prosecutors

Date: June 30, 2004  
Parties: Roosevelt Stout v. Permanent General Insurance  
Deposition: Ventura, CA

Date: September 25, 2004  
Parties: Roosevelt Stout v. Permanent General Insurance  
Court: Ventura, CA  
Client: Permanent General Insurance, Defendant

Date: November 4 & 5, 2004  
Parties: Enrique Gutierrez v. CSAA Insurance  
Court: Fresno, CA  
Client: CSAA, Defendant

Date: December 10, 2004  
Parties: Joseph Walker v. State Farm Insurance  
Court: Baton Rouge, LA  
Client: State Farm Insurance, Defendant



Date: March 1, 2005  
Parties: Lon Vicknair v. State Farm Insurance  
Court: Baton Rouge, LA  
Client: State Farm Insurance, Defendant

Date: April 5, 2005  
Parties: Kalicaj v. Allstate Insurance  
Deposition: Morristown, NJ

Date: April 27, 2005  
Parties: Mananian v. CSAA  
Deposition: Fresno, CA

Date: June 29, 2005  
Parties: Mananian v. CSAA  
Court: Fresno CA  
Client: CSAA Insurance, Defendant

Date: July 20, 2005  
Parties: Commonwealth of Kentucky v. Terry Hunt  
Court: Butler Circuit Court, Morgantown KY  
Client: Commonwealth of Kentucky, Prosecutors

Date: July 27, 2005  
Parties: Sean Ledin v. Mercury Insurance  
Deposition: NETS facility, Fall River MA

Date: August 9, 2005  
Parties: Terry and Christina Ramsey v. Nationwide Mutual Insurance Company  
Court: Gaston County District Court, Gastonia NC  
Client: Nationwide Insurance, Defendant

Date: November 10, 2005  
Parties: Gregory Maugeri v. Liquidation Bureau  
Hearing: New York State Insurance Dept., New York NY  
Client: Certified SIU Services

Date: November 15, 2005  
Parties: Ferreras v. Permanent General insurance  
Deposition: Law Offices of Adrienne Cohen, Santa Ana CA

Date: January 25 & 26, 2006  
Parties: Roger Hulbert v. Unitrin Direct Insurance  
Court: Superior Court Div. 9, Redondo Beach CA  
Client: Unitrin Direct Insurance, Defendant

Date: June 8, 2006  
Parties: Nilgun Ogun v. Sid Harvey Industries  
Arbitration: Weathersfield CT / Arbitration Forums Inc.  
Client: Sid Harvey / Utica Mutual Insurance, Defendant

Date: October 4, 2006  
Parties: Arkadiy Abramov v. Utica Mutual Insurance  
Court: Kings County, Brooklyn NY  
Client: Arkadiy Abramov, Plaintiff

**North Eastern Technical Services, Inc.**

**PO Box 5150  
Fall River MA 02723**

**Richard J. Pacheco**

**Curriculum Vitae**

My personal qualifications are:

Six years, USAF Civil Engineer / Structural Technician

Three years, Army Corps of Engineers

Forensic Locksmith, Certified, Bonded and Registered

Constable, Fall River Police Department, ten years

Certified Diver / Master Diver / Public Safety Diver

Mechanical Technician for General Electric with 17 years experience in the lamp and metals division

Owned and operated Richie's Automotive Repair

Certified Fire & Explosion Investigator (CFEI)

Service Technician for Electronic alarms, both auto and home

Three years of experience USAF Security/Police/Armorer

Received specialized training by factory representatives in Mobility Products

Received specialized factory training in the examination and operation of heavy equipment

Certificate in Microscopy, CACMLE

**Member: Northeastern Association of Forensic Scientists**

**Diplomate: Board Certified Forensic Examiner,**

**American Board of Forensic Examiners**

**Member: Society of Automotive Forensic Examiners**

**Master Forensic Examiner**

**Fellow, American College of Forensic Examiners**

**Member: Honorable Order of Kentucky Colonels**

**By Order of Governor Paul E. Patton**

Member: International Association of Arson Investigators, 1986 to present.

Member: International Association of Auto Theft Investigators, 1986 to present.

Member: National Association of Fire Investigators, 1986 to present

Member: American Boat and Yacht Council

Member: Associated Locksmiths of America

Member: National Locksmith Association

Member: National Fire Protection Association

Member: American Association for the Advancement of Science

Member, International Association of Investigative Locksmiths, former Board Member

Member, International Association of Marine Investigators

**Approved as Instructor for Continuing Education Credit, State of Florida**

**North Eastern Technical Services, Inc.**

**PO Box 5150  
Fall River MA 02723**

**Richard J. Pacheco**

**Curriculum Vitae**

My personal qualifications are:

Six years USAF Civil Engineer, Structural:

Responsible for the overseeing of civilian contractors and military personnel in the peacetime or combat construction of entire air bases and air base defense emplacements, including all phases of construction: Electrical, mechanical, pavements, etc. Responsible also for the training of all personnel.

Three years Army Corps of Engineers:

Responsible for building, maintenance, inspection of bridges, facilities and equipment. Team leader.

Three years USAF Security, Police:

Watch Commander. Responsible for the security of alert aircraft, base facilities, and the flight line, supervision and training of numerous personnel.

Three years Armorer:

Responsible for all weapons in inventory and their repair, rebuilding and maintenance, and qualification of personnel in their use.

Raytheon Corporation:

Responsible for the investigation and recovery of all classified tooling, equipment, and plans for anti-missile missile system.

General Electric Corporation:

From tool setter to mechanical technician. Worked with the engineers in the design and manufacture of machines, tools and equipment. Tested products, tested electrical, hydraulic, pneumatic, and mechanical systems for failure. Responsible for redesign, repair, and return to production any and all units (i.e. metal presses, plastic injectors, vacuum chambers, metallizers, in the Lamp Metals Division. Quality control of all, and development of tests and equipment to test products. Seventeen years experience.

Richie's Automotive:

All phases of repair of automobiles.

Marine Recovery Service Inc.

All phases of diver safety, dive operations. Search and Rescue, recovery of bodies, vessels, and autos from ocean, lakes, quarries and rivers.

North Eastern Technical Services Inc.  
(Formerly MRS Inc.)

Conduct inspections of all items that float, fly or drive on land for product failure, defects. Developed tests and products for other companies.

Received extensive training in Fire Sciences, Mechanics, Electronics, Tool Mark Identification.

Built company from three-person business to multi-million dollar international entity.

Developed comprehensive tool-mark analysis test, which has been approved by the courts (Daubert, Frye), and used by law enforcement to solve numerous crimes. (See [WWW.NETSEXAM.COM](http://WWW.NETSEXAM.COM))

Written articles on various subjects, taught at various police academies (Federal, State and local), taught at numerous insurance companies and professional organizations on the subjects of Fraud, Product failure, Fire, etc. Guest lecturer at Piedmont Community College Forensics Division and others. Received training in reconstruction of damaged products, automobiles, etc. to determine their pre-damage condition.

Received specialized training by factory representatives, and factory training on mobility products including programming, interrogation, assembly, disassembly, maintenance, defects inspection testing and failure analysis.

Received specialized factory training in the examination and operation of heavy equipment

### **Special Training:**

May 20 thru 24, 1985	Saint Anselm College Arson Investigation
August 8, 1986	International Association of Auto Theft Investigators Completed 36 hr. course on Auto Theft Investigation
August 8, 1986	National Automobile Theft Bureau Received Certificate of Achievement in Auto Theft Investigation
November 18, 1986	Yankee Security Convention Completed course on Domestic Autos
November 19, 1986	Yankee Security Convention Completed course on Steering Column Locks
November 20, 1986	Yankee Security Convention Completed course on Lock Picking Techniques
May 12 thru 14, 1987	International Association of Auto Theft Investigators Completed course on Auto Theft
November 12, 1987	Yankee Security Convention Completed course on Foreign Autos
November 13, 1987	Yankee Security Convention Completed course on Auto Security
May 17 thru 19, 1988	International Association of Auto Theft Investigators Completed course on Auto Theft Investigations
June 13 thru 17, 1988	Saint Anselm College Arson Seminar Received Certificate in Arson Investigation
May 15 thru 17, 1990	Montgomery County Community College Completed Vehicle Theft Investigation Training
May 15 thru 17, 1990	International Association of Auto Theft Investigators Received Certificate in Auto Theft Investigation
November 14, 1990	Yankee Security Convention Completed course on GM Security Systems
November 15, 1991	Philadelphia Fire Academy Seminar in Arson Detection
December 1991	Cape Cod Community College Course in Fire Investigation and Evidence Procedures
February 24, 1992	American Society of Industrial Security, Atlanta GA

Insurance Fraud Seminar

March 4, 1992	Hanover Insurance, Auburn MA Boat Damage Analysis
March 12, 1992	Fraud Awareness Seminar MAATAI, Woburn, MA Accident Reconstruction
October 17, 1992	Northeast Association of Forensic Scientists Atlantic City NJ Footwear Identification from Prints Accident Reconstruction Pedestrian Accident Reconstruction Auto, Bicycle
May 25, 1993	New Jersey State Police Training Academy VIN Number Locations, Identification and Reconstruction
July 26, 1993	Associated Locksmiths of America, Chicago IL Forensic Locksmithing
August 3-8, 1993	IAATI International Conference on Auto Theft Boise, ID
September 7-8, 1993	Indiana Anti-Car Theft Committee Seminar (Law Enforcement Only)
March 15, 1994	Auto Theft / Arson Seminar, Ohio Chapter IAAI Cincinnati Fire & Police Dept.
June 6-8, 1994	Penn. State College, PAAI Forensic Chemistry, Fire Debris Analysis Use of Dogs at Fire Scenes
Aug. 8-12, 1994	IAATI International Conference on Auto Theft Nashville TN
May 20, 1995	Warren County Arson Task Force Explosives, Chemical Bomb Components, Detonators
June 8, 1995	The Financial Paper Chase Nationwide Insurance Training Center
June 13, 1995	Philadelphia Association of Defense Counsel Prosecution of Insurance Fraud, Mail Fraud Under Federal and State Statutes 3 CLE Hrs. credit
October 25 & 26, 1995	Northeastern Association of Forensic Scientists Annual Meeting



Crime Scene Workshop  
Mystic CT

May 1-3, 1996	The Tennessee Advisory Committee on Arson Fire Investigation School, Murfreesboro TN Live Burn Exercise
February 7, 1997	North Carolina Insurance Crime Information Exchange Fourth Annual Training Conference Aspects of Insurance Fraud (Property & Liability) 13 hrs Charlotte NC
November 19-21, 1997	Florida Advisory Committee on Arson Prevention Annual Seminar Florida State Fire College, Ocala, FL Workshops: Examination Under Oath, Financial Motives, Spoliation of Evidence
February 10, 1998	Georgia Auto Theft Intelligence Council Vehicle Titles, Salvage, Thefts and Arson Savannah GA
March 26, 1998	Auto Fraud Seminar Georgia Auto Theft Unit, Duluth GA
October 27, 1998	Auto Theft / Fraud Seminar Pennsylvania Auto Crimes Investigators Association Philadelphia PA
November 4, 1998	Auto Theft / Arson Seminar Florida Fire Marshals Conference Clearwater Beach FL
October 14 & 15, 2000	Auto Theft / Arson – Forensic Lock Examination Course International Association of Investigative Locksmiths Edison NJ
November 1, 2000	2000 Fraud Seminar Insurance Institute of Indiana
July 17, 2001	Investigative Locksmithing III ALOA Seminar Baltimore MD
July 18, 2001	Forensic Locksmithing 2001 ALOA Seminar Baltimore MD
June 28-30, 2002	International Association of Investigative Locksmiths



Inaugural Educational Conference  
Atlantic City NJ

March 6, 2003 "Combating the Latest Trends in Auto Insurance Fraud"  
Insurance Fraud Seminar  
California District Attorneys Association  
Garden Grove CA

**Instructional Seminars Given:**

January 1986	Auto Arson Investigations Seminar Provided to Revere MA Fire Department
February 1987	Auto / Arson Investigation Seminar Provided to American Universal Insurance
April 4, 1987	Cape Cod Community College, Auto Arson Seminar Given for Fire and Police Agencies
April 27, 1987	Auto Theft / Arson / Fraud Seminar Provided to Hanover Insurance, Braintree MA
October 6, 1988	Auto Theft / Arson / Fraud Seminar Provided to AMICA Insurance, Providence RI
Continuing Seminars Quarterly, AMICA Appraiser Training Staff	
November 2, 1988	Auto Theft / Arson / Fraud Seminar Provided to CIGNA Insurance, Quincy MA
December 13, 1988	Auto Theft / Arson / Fraud Seminar Provided to Metropolitan Insurance, RI
January 14, 1989	Auto Theft / Arson / Fraud Seminar Shrewsbury Police Department
January 24, 1989	Auto Theft / Arson / Fraud Seminar Provided to Commonwealth Auto Reinsurers, Boston MA
April 26, 1989	Auto Theft / Arson / Fraud Seminar Provided to CIGNA Insurance, Quincy MA
May 9, 1989	Auto Theft / Arson / Fraud Seminar Provided to C.N.A. Insurance in Quincy MA
August 10, 1989	Auto Theft / Arson / Fraud Seminar Ronnie's Salvage, Billerica MA
October 3, 1989	Auto Theft / Arson / Fraud Seminar Provided to Norfolk & Dedham Group, Dedham MA

October 11, 1989	Auto Theft / Arson / Fraud Seminar Provided to Pennsylvania Auto Crime Investigators Association
October 18, 1989	Auto Theft / Arson / Fraud Seminar Provided to AMICA Insurance, Tucson AZ
December 6, 1989	Auto Theft / Arson / Fraud Seminar Provided to Metropolitan Insurance, Warwick RI
December 13, 1989	Auto Theft / Arson / Fraud Seminar Provided to AMICA Insurance, Providence RI
December 20, 1989	Auto Theft / Arson / Fraud Seminar Provided to Aetna Insurance, Brockton MA
February 7, 1990	Auto Theft / Arson / Fraud Seminar Provided to Aetna Insurance in Brockton MA
March 21, 1990	Auto Theft / Arson / Fraud Seminar Provided to FBI / NJ Police Academy, Gloucester NJ
April 11, 1990	Auto Theft / Arson / Fraud Seminar Provided to AMICA Insurance, Providence RI
April 27, 1990	Auto Theft / Arson / Fraud Seminar Provided to New Jersey Vehicle Theft Investigators Association
October 9, 1990	Auto Theft / Arson / Fraud Seminar Provided to Nationwide Insurance, Springfield MA
October 17, 1990	Auto Theft / Arson / Fraud Seminar Provided to Peerless Insurance, Rocky Hill CT
October 22, 1990	Auto Theft / Arson / Fraud Seminar Provided to AMICA Insurance, Providence RI
October 30, 1990	Auto Theft / Arson / Fraud Seminar Provided to International Technical Institute, Marco Island FL
October 1990	Auto Theft / Arson / Fraud Seminar Provided to International Association of Special Investigation Units, Seattle WA
November 5, 1990	Auto Theft / Arson / Fraud Seminar Provided to State Farm Insurance, Denver CO
November 7, 1990	Auto Theft / Arson / Fraud Seminar Provided to Allstate Insurance, Denver CO
December 4, 1990	Auto Theft / Arson / Fraud Seminar

	Provided to Hanover Insurance, North Dartmouth MA
December 17, 1990	Auto Theft / Arson / Fraud Seminar Provided to Providence Police Dept., Providence RI
January 8, 1991	Auto Theft / Arson / Fraud Seminar Provided to CIGNA Insurance, Quincy MA
January 16, 1991	Auto Theft / Arson / Fraud Seminar Provided to Middlesex Mutual Insurance, Middletown CT
January 31, 1991	Auto Theft / Arson / Fraud Seminar Provided to Progressive Insurance, Tampa FL
March 2, 1991	Auto Theft / Arson / Fraud Seminar Provided to Burrilville Police Dept., Burrilville RI
March 4, 1991	Auto Theft / Arson / Fraud Seminar Provided to FBI in Gloucester NJ
March 13, 1991	Auto Theft / Arson / Fraud Seminar Providence Police Academy, Providence RI
April 5, 1991	Auto Theft / Arson / Fraud Seminar Provided to Progressive Insurance, Tampa FL
April 9, 1991	Auto Theft / Arson / Fraud Seminar Provided to Nationwide Insurance, Columbus OH
April 16, 1991	Auto Theft / Arson / Fraud Seminar Provided to AMICA Insurance, Providence RI
April 25, 1991	Auto Theft / Arson / Fraud Seminar NJ Vehicle Theft Investigators, Bordentown NJ
May 9, 1991	Auto Theft / Arson / Fraud Seminar Provided to Metropolitan Insurance, King of Prussia PA
May 10, 1991	Auto Theft / Arson / Fraud Seminar Provided to Pennsylvania Auto Crime Investigators Association
May 15, 1991	Auto Theft / Arson / Fraud Seminar Provided to Erie Insurance, Erie PA
June 18, & 19, 1991	Auto Theft / Arson / Fraud Seminar Provided to Nationwide Insurance in CT
June 20, 1991	Auto Theft / Arson / Fraud Seminar Provided to Travelers Insurance in Bedford NH
July 1, 1991	Auto Theft / Arson / Fraud Seminar

	Provided to Alliance of American Insurers, Charleston SC
July 11, 1991	Auto Theft / Arson / Fraud Seminar Provided to Progressive Insurance, Queens NY
August 1, 1991	Auto Theft / Arson / Fraud Seminar Provided to Progressive Insurance, Houston TX
September 18, 1991	Auto Theft / Arson / Fraud Seminar Provided to Progressive Insurance, Columbus OH
October 9, 1991	Auto Theft / Arson / Fraud Seminar Provided to The Robert Plan, Lynnbrook NY
November 1, 1991	Auto Theft / Arson / Fraud Seminar Provided to GEICO Insurance, Woodbury NY
November 15, 1991	Auto Theft / Arson / Fraud Seminar Provided to State Farm Insurance, BATF, and Philadelphia Fire Marshals, Philadelphia PA
February 24, 1992	Fraud Seminar American Society for Industrial Security, Atlanta GA
February 25, 1992	Auto Theft / Arson / Fraud Seminar AMICA Insurance, Providence RI
March 5, 1992	Auto Theft / Arson / Fraud Seminar Hanover Insurance, Auburn MA
March 16, 1992	Auto Theft / Arson / Fraud Seminar General Accident Insurance, Orange CT
April 7, 1992	Auto Theft / Arson / Fraud Seminar CHUBB Insurance, NJ
April 23, 1992	Auto Theft / Arson / Fraud Seminar RI Adjusters Association
May 4, 1992	Auto Theft / Arson / Fraud Seminar Travelers Insurance, Hartford CT
May 12, 1992	Auto Theft / Arson / Fraud Seminar Aetna Insurance, Hartford CT
May 14, 1992	Auto Theft / Arson / Fraud Seminar GEICO Insurance, Washington DC
May 15, 1992	Auto Theft / Arson / Fraud Seminar AMICA Insurance, Baltimore MD

June 16, 1992	Auto Theft / Arson / Fraud Seminar General Accident Insurance, Melville NY
September 9, 1992	Auto Theft / Arson / Fraud Seminar PIA, North Haven CT
September 18, 1992	Auto Theft / Arson / Fraud Seminar Travelers Insurance, Albany NY
September 24, 1992	Auto Theft / Arson / Fraud Seminar Travelers Insurance, East Meadow NY
October 9, 1992	Auto Theft / Arson / Fraud Seminar Metropolitan Insurance, Tewksbury MA
October 14, 1992	Auto Theft / Arson / Fraud Seminar Ohio Casualty, Philadelphia PA
October 14, 1992	Workshops (2), Technical Aspects of Auto Give-up New Jersey Special Investigators Association Eatontown NJ
October 17, 1992	Forensic Aspects of Auto Theft and Arson Northeast Association of Forensic Scientists, Atlantic City NJ
October 22, 1992	Auto Theft / Arson / Fraud Seminar Metropolitan Insurance, Rocky Hill CT
November 4, 1992	Seminar on Auto Theft Fraud Indiana Anti-Car Theft Committee, Indianapolis IN
November 9, 1992	Auto Theft / Fraud Workshop Alliance of American Insurers Underwriting Management & Technical Conference, New Orleans LA
November 11, 1992	1992 Advance Insurance Fraud Seminar National Society of Professional Insurance Investigators Columbus OH
November 18, 1992	Law Enforcement Seminar NY-NJ Anti-Car Theft Committee, General Motors Corp. Tarrytown NY
December 1, 1992	Auto Theft / Fraud Training RI Police Academy
January 15, 1993	Auto Theft / Arson / Fraud Seminar Cromwell CT
January 21 & 22, 1993	Auto Theft / VATS / Fraud Seminar

MDA Insurance, NJ

March 2, 1993	Seminar – Accident Reconstruction Great American Insurance, CT
May 25, 1993	Auto Theft / Arson / Fraud Seminar New Jersey State Police Training Center
August 3-8, 1993	IAATI International Conference Forensics for Law Enforcement, Boise ID
September 7-8, 1993	Indiana Anti-Car Theft Committee Seminar (For Law Enforcement Only), Indianapolis IN
September 23, 1993	Auto Theft / Arson / Fraud Seminar AMICA Insurance, Glen Rock NJ
November 2-3, 1993	Auto Theft / Arson / Fraud Seminar Progressive Insurance, Secaucus & Princeton NJ
February 3, 1994	Auto Theft / Fraud / Marine Seminar Continental Insurance, Princeton NJ
February 27, 1994	Auto Theft / Arson / Fraud Seminar Kansas City Arson Task Force, IAAI, & State Fire Marshal Kansas City MO
March 15, 1994	Auto Theft / Arson / Fraud Seminar Ohio Chapter of the International Association of Arson Investigators, Ohio Auto Theft Investigators Association, and Cincinnati Police and Fire Departments, Cincinnati OH
April 19, 1994	Auto Theft / Arson / Fraud Seminar Western Canadian Auto Theft Investigators, Royal Canadian Mounted Police, and Edmonton Police Service, Edmonton, Alberta, Canada
May 4, 1994	Northeast Regional Training Seminar Insurance Fraud, Accident Reconstruction, Auto Theft, Fires USAA Insurance Company
June 7, 1994	Seminar, Reconstruction of Fire Scene, Auto / Marine Penn. Association of Arson Investigators, Penn. State University
June 15, 1994	Auto Theft / Arson / Fraud Practical Demo Prudential Insurance NJ
July 7, 1994	Auto Theft / Arson / Fraud Practical Demo USAA Insurance, NJ
July 13, 1994	Auto Theft / Arson / Fraud Seminar



Peerless Insurance Home Office, Keene NH

August 31, 1994	Auto Theft / Arson / Fraud Seminar American Family Insurance, Madison WI
September 12, 1994	Indiana Anti-Car Theft Committee Seminar (For Law Enforcement Only), Indianapolis IN
September 14, 1994	Auto Theft / Arson / Fraud Seminar International Association of Special Investigation Units Minneapolis MN
September 16, 1994	Auto Theft / Arson / Fraud Seminar US F&G Insurance, Baltimore MD
October 11, 1994	Auto Theft / Arson / Fraud Seminar Bankers & Shippers Insurance & NCICIE, Greensboro NC
October 19, 1994	Auto Theft / Arson / Fraud Seminar USAA Insurance, New Seabury MA
October 27, 1994	Auto Theft / Arson / Fraud Seminar Norfolk & Dedham Insurance, Norwood MA
December 19, 1994	Auto Theft / Arson / Fraud Seminar State Farm Insurance, NICB, and Washington State Police Seattle WA
February 3 & 4, 1995	Southeast Regional IAAI Seminar: Vehicle Fires with Live Burn Exercises, Gulf Shores AL
April 3-5, 1995	Auto Theft / Arson / Fraud Seminar USAA Insurance Corporate HQ, San Antonio TX
April 10-12, 1995	Auto Theft / Arson / Fraud Seminar Ohio Chapter IAAI, Ohio Theft Investigators Association Cincinnati OH
May 19, 1995	Auto Theft / Arson / Fraud Seminar IASIU Regional, Richmond VA
May 20, 1995	Auto Theft / Arson / Fraud Seminar Warren County Arson Task Force, Cincinnati OH
May 31, 1995	Auto Theft / Arson / Fraud Seminar USAA Insurance, Long Island NY
June 8, 1995	Auto Theft / Arson / Fraud Seminar Nationwide Insurance Training Facility, Columbus OH
June 13, 1995	Use of Forensic and Engineering Testimony in Insurance Fraud

Cases, Philadelphia Association of Defense Counsel,  
Philadelphia PA

June 15, 1995	Auto Theft / Arson / Fraud Seminar Peerless Insurance, Rocky Hill CT
July 13, 1995	Auto Theft / Arson / Fraud Seminar USAA Insurance, Detroit MI
September 27, 1995	Auto Theft / Fraud / Arson Seminar State Farm Insurance, Tennessee Statewide
October 19, 1995	Auto Theft / Fraud / Arson Seminar Mississippi Fire Investigators Association Annual Meeting Vicksburg MS
November 9, 1995	Advanced Insurance Fraud Seminar National Society of Professional Insurance Investigators Columbus OH
February 9, 1996	Auto Theft / Fraud / Arson Seminar US F&G Insurance National Academy, Phoenix AZ
March 1, 1996	Auto Theft / Fraud / Arson Seminar Tennessee Claims Association, Nashville TN
March 21, 1996	Auto Theft / Fraud / Arson Seminar Safeco Insurance, Richmond VA
March 29, 1996	Auto Theft / Fraud / Arson Seminar State Adjusters Association of Indiana, Indianapolis IN
May 1-3, 1996	Auto Theft / Fraud / Arson Seminar Fire Investigation School, The Tennessee Advisory Committee On Arson, Murfreesboro TN
May 8, 1996	Auto Theft / Fraud / Arson Seminar Madison County Sheriff's Dept., Jackson TN
June 17, 1996	Auto Theft / Fraud / Arson Seminar US F&G Insurance, Birmingham AL
June 18, 1996	Auto Theft / Fraud / Arson Seminar Allstate Insurance, Birmingham AL
June 26, 1996	Auto Theft / Fraud / Arson Seminar Netherlands Insurance, Keene NH
September 20, 1996	Auto Theft / Fraud / Arson Seminar Puget Sound Special Investigators, Seattle WA



January 21, 1997	Auto Theft / Fraud / Arson Seminar Regional Auto Theft Team, Baltimore MD
January 22, 1997	Auto Theft / Fraud / Arson Seminar Nationwide Insurance, Memphis TN
February 6, 1997	Auto Theft / Fraud / Arson Seminar ICIE, Charlotte NC
March 12, 1997	Auto Theft / Fraud / Arson Seminar Tennessee / Arkansas IAAI, Memphis TN
April 24, 1997	Auto Theft / Fraud / Arson Seminar Connecticut Insurance Day, Hartford CT
May 3, 1997	Auto Theft / Fraud / Arson Seminar Tennessee Claims Association, Memphis TN
May 7, 1997	Auto Theft / Fraud / Arson Seminar Pennsylvania Claims Association, Newportville PA
May 19, 1997	Auto Theft / Fraud / Arson Seminar Alliance of American Insurers, Orlando FL
May 22, 1997	Auto Theft / Fraud / Arson Seminar Nationwide Insurance and the NC State Prosecutors Office Charlotte NC
June 20, 1997	Auto Theft / Fraud / Arson Seminar GEICO Insurance, Melville NY
July 9, 1997	Auto Theft / Fraud / Arson Seminar American Reinsurers, Police and Fire Departments Columbus GA
July 19, 1997	Auto Theft / Fraud / Arson Seminar State Farm Insurance, Police and Fire Departments Columbus GA
September 17, 1997	Auto Theft / Fraud / Arson Seminar International Association of Arson Investigators Shreveport LA
October 17, 1997	Auto Theft / Fraud / Key Pathway Seminar Progressive Insurance SIU, Atlanta GA
October 21, 1997	Auto Theft / Fraud / Arson Seminar Alliance of American Insurers, Orlando FL
November 19-21, 1997	Seminar: Key Pathway, Auto Arson, Mechanical Analysis

And Forensic Locksmithing  
Florida Advisory Committee on Arson Prevention, 21<sup>st</sup> Annual  
Seminar, Florida State Fire College, Ocala FL

January 14, 1998	Auto Theft / Fraud / Arson Seminar Insurance Women's Seminar, Fall River MA
February 10, 1998	Auto Theft / Fraud / Arson / Key Pathway Seminar Georgia Auto Theft Intelligence Council Savannah GA
March 11, 1998	Auto Theft / Fraud / Arson Seminar Cooperative Fire Insurance, Burlington VT
March 26, 1998	Auto Theft / Fraud / Arson Seminar Georgia Auto Theft Unit, Duluth GA
April 16, 1998	Auto Theft / Fraud / Arson Seminar, Key Pathway Seminar IASIU, Tallahassee FL
April 27, 1998	Auto Theft / Fraud / Key Pathway Seminar State Attorneys, State of Arizona, Phoenix AZ
June 15, 1998	Auto Theft / Fraud / Arson / Key Pathway Seminar IAATI, Decatur GA
June 22, 1998	Auto Theft / Fraud / Arson Seminar USAA Insurance, Billerica MA
July 1, 1998	Auto Theft / Fraud / Key Pathway Seminar For Metropolitan Insurance SIU NETS facility, Fall River MA
August 4, 1998	Auto Theft / Fraud / Key Pathway Seminar Premier Insurance, Fort Washington PA
August 24, 1998	Auto Theft / Fraud / Key Pathway Seminar For North Carolina Farm Bureau Insurance NETS facility, Fall River MA
August 25, 1998	Auto Theft / Fraud / Key Pathway Seminar For GRE Insurance, NETS facility, Fall River MA
September 3, 1998	Auto Theft / Fraud / Key Pathway Seminar Progressive Insurance, Phoenix AZ
September 29, 1998	Auto Theft / Fraud / Arson Seminar Florida Arson Seminar, Orlando FL
October 27, 1998	Auto Theft / Fraud / Key Pathway Seminar

Pennsylvania Auto Crimes Investigators Association  
Philadelphia PA

November 4, 1998	Auto Theft / Arson / Key Pathway Seminar Florida Fire Marshals Conference, Clearwater Beach FL
November 10-11, 1998	Auto Theft / Arson / Key Pathway Seminar Nationwide Insurance, Police personnel, State's Attorneys And Prosecutors, Miami FL
January 19, 1999	Auto Theft / Arson / Key Pathway Seminar Miami Dade Police Institute, Miami FL
March 23, 1999	Auto Theft / Key Pathway Seminar For Allstate Insurance, NETS facility, Fall River MA
April 1, 1999	Auto Theft / Arson / Key Pathway Seminar Florida Arson Control and Prevention, and State Farm Insurance Jacksonville FL
April 2, 1999	Key Pathway Training Florida Law Enforcement Agencies, Jacksonville Region Northeast Florida Investigative Support Center Jacksonville FL
May 5, 1999	Auto Fraud / Key Pathway Seminar Metropolitan Insurance, Tampa FL
May 6, 1999	Auto Fraud / Key Pathway Seminar AIG Insurance, Conshohocken PA
May 7, 1999	Photographic Techniques for Law Enforcement Westport MA
May 25, 1999	Combating Fraudulent Auto Theft Claims Kentucky Chapter IASIU, Louisville KY
May 27, 1999	Training Seminar: Key Pathway Analysis Forensic Institute, Central Piedmont Community College Charlotte NC
June 2, 1999	Auto Theft / Fraud / Key Pathway Seminar Allstate Insurance, Bedford NH
June 22, 1999	Auto Theft / Fraud / Key Pathway Seminar Louisiana Chapter IASIU, New Orleans LA
July 15 & 16, 1999	Key Pathway for Law Enforcement Assistant DA for State of Alabama, Jefferson County Sheriff's Department, NETS Facility, Fall River MA

August 20, 1999	Auto Theft / Fraud / Key Pathway Seminar Tennessee Chapter IAAI Gatlinburg TN
November 8, 1999	Auto Theft / Fraud / Key Pathway Seminar South Carolina Insurance Fraud Investigators Columbia SC
November 11, 1999	Auto Theft / Fraud / Key Pathway Seminar 1999 Advanced Insurance Fraud Seminar National Society of Professional Insurance Investigators Cincinnati, OH
December 20, 1999	Auto Theft / Fraud / Key Pathway Seminar German, OH Township Police Dept. NETS Facility, Fall River MA
January 5, 2000	Auto Theft / Fraud / Key Pathway Seminar Progressive Insurance Newport News VA
January 14, 2000	Auto Theft / Fraud / Key Pathway Seminar NEAIFI Metropolitan P&C facility, Lowell MA
February 25, 2000	Auto Theft / Fraud / Key Pathway Seminar Allstate Insurance, New Orleans PD Covington LA
March 1, 2000	Auto Theft / Fraud / Key Pathway Seminar Allstate Insurance and local law enforcement Little Rock AR
March 10, 2000	Auto Theft / Fraud / Key Pathway Seminar Georgia Fire Investigator's Association Inc. Columbus GA
April 7, 2000	Auto Theft / Fraud / Key Pathway Seminar Progressive Insurance Indianapolis IN
April 13, 2000	Auto Theft / Fraud / Key Pathway Seminar 14 <sup>th</sup> Annual Claims Adjusting Seminar Powers, McNalis, Moody & Groelle Ft. Lauderdale, FL
May 4, 2000	Auto Theft / Fraud / Key Pathway Seminar IAAI Burlington NC
May 9, 2000	Auto Theft / Fraud / Key Pathway Seminar

Utah Chapter IASIU  
Salt Lake City UT

June 22, 2000	Auto Theft / Fraud / Key Pathway Seminar Travelers Insurance NETS Facility, Fall River MA
Oct. 19, 2000	Auto Theft / Fraud / Key Pathway Seminar St. Louis Chapter IASIU St. Louis MO
Nov. 1, 2000	Forensics and Key Pathway Analysis Insurance Institute of Indiana Indianapolis, IN
Feb. 17, 2001	Key Pathway Training Provided to IAIL Fall River, MA
March 22, 2001	Auto Theft / Fraud / Key Pathway Seminar Nationwide Insurance Harrisburg PA
March 28, 2001	Auto Theft / Fraud / Key Pathway Seminar Indiana Insurance Company Cincinnati, OH
April 30, 2001	Auto Theft / Fraud / Key Pathway Seminar Taunton Insurance Agents Taunton, MA
May 16, 2001	Key Pathway Seminar Virginia Chapter IASIU and the Virginia State Police Insurance Fraud Division Richmond, VA
June 28, 2001	Key Pathway Seminar Provided to Pilgrim Insurance NETS Facility, Fall River MA
Sept. 12, 2001	Forensics in Fraud Examinations Massachusetts Association of Insurance Women Inc. Fall River, MA
Oct. 9, 2001	Key Pathway Seminar Indiana Chapter, National Society of Professional Insurance Investigators Indianapolis, IN
Oct. 17, 2001	Auto Theft / Arson / Key Pathway Seminar

47<sup>th</sup> Annual Conference, Oklahoma Chapter, IAAI  
Tulsa, OK

June 28-30, 2002	Auto Theft / Arson / Key Pathway Seminar International Association of Investigative Locksmiths Inaugural Educational Conference Atlantic City NJ
July 30, 2002	Forensic Locksmithing, Key Pathway Advanced Special Investigation School Farmers Insurance Simi Valley, CA
October 17, 2002	Transponder Vehicles NY SSIU Conference Batavia, NY
March 5, 2003	Auto Theft / Fraud / Key Pathway Seminar IASIU San Diego, CA
March 5, 2003	Auto Theft / Fraud / Key Pathway Seminar Permanent General Insurance Mission Viejo, CA
March 6, 2003	"Forensic Lock Analysis and Insurance Fraud" California District Attorneys Association Insurance Fraud Seminar Garden Grove CA
April 23, 2003	Key Pathway / Transponder Systems Northern California Fraud Investigators Association Monterey, CA
June 11, 2003	"Auto Theft, Was it Really Stolen?" Louisiana State Chapter IASIU Conference New Orleans, LA
June 12, 2003	"Transponders and Other Anti-Theft Devices" Florida Insurance Fraud Education Committee DIF/SIU Joint Conference Orlando FL
June 18, 2003	Transponders, Light Bulb Analysis, Accident Reconstruction, Auto Theft, Arson Safeco Insurance, New Britain CT
July 10, 2003	Key Pathway / Transponder Systems CNA Insurance, Nashville TN
February 26, 2004	Auto Theft / Arson / Key Pathway Seminar



Mississippi Chapter IASIU  
Ridgeland MS

April 7, 2004

Auto Theft / Key Pathway / Transponder Systems  
NY Chapter IASIU  
Saratoga Springs, NY

June 8, 2004

Auto Theft / Arson / Key Pathway / Transponder Systems  
Sentry Insurance  
Richmond, VA

July 22, 2005

Auto Theft / Key Pathway / Transponder Systems  
The Concord Group  
Auburn ME

August 5, 2005

Auto Theft / Key Pathway / Crash Data Retrieval /Transponder  
Systems  
Nationwide Insurance  
Rocky Hill CT

Sept. 14, 2005

"Forensics of Auto Theft: Key Pathway, Transponder Systems, Etc."  
GEICO  
Lakeland FL

Nov. 15, 2006

"Auto Theft Trends"  
New York Anti Car Theft & Fraud Association Annual Education  
Conference for Insurance Claims and SIU Personnel  
Melville NY

**Published Articles:**

"Forensic Analysis of Lock Assemblies" IASIU Journal, March 1995

"Unlocking the Truth" IASIU Journal, March 2001

"Teeing Off on Fraudulent Hail Claims" IASIU Journal, September 2001

"Spoliation of Evidence for the Field Technician" IAIL Journal Oct. 2002

"Examining Reported Stolen and Burnt Vehicles: A Multi-Disciplinary Approach" and Evidence  
for the Field Technician" New Jersey Vehicle Theft Investigators Website, Sept. 2001

**The following list represents courts where I have qualified to testify as an expert witness:**

District Courts:

Fall River, New Bedford, Milford, Worcester, Cambridge, South Boston, Hingham, Quincy, Braintree, Brockton, Somerville, Lowell, Lawrence, Stoughton, Malden, Clinton, Roxbury, Fitchburg, Framingham, Concord, Chelsea, Springfield, and Wareham, MA

Providence, RI

Nashville, TN

New York, NY

Louisville, KY

Boston Municipal Court

Superior Courts:

Dedham, Lowell, Bristol County, Suffolk County, Worcester MA; N. Haverhill NH; Whatcom County, Bellingham WA

Federal Courts:

Wichita, KS; Cleveland, OH; Louisville, KY; Bridgeport, CT

I have also qualified in the states of Pennsylvania, Rhode Island, Kansas, New Hampshire, Tennessee, Ohio, Oklahoma, Maine, Missouri, New Jersey, South Carolina, Virginia, California, Connecticut, Maryland, Michigan, New York, Louisiana, Florida and Washington.

I presently have cases pending in Mississippi, Pennsylvania, Minnesota, Missouri, New Jersey, Connecticut, Massachusetts, Rhode Island, Washington, New Hampshire, California, Tennessee, Florida, Idaho, Hawaii, and LaPaz, Bolivia. In the twenty-five years in which I have been doing this type of work I have testified in between three and four hundred cases. I have never failed to qualify in any court, US or international.

Richard J. Pacheco, CFEI, ABFE, MFE, CFL  
Consultant to NETS, Inc.,

Fire and Police Departments

Master Forensic Examiner

Fellow, American College of Forensic Examiners

Diplomate, Board Certified Forensic Examiner,

American Board of Forensic Examiners

Member, North East Association of Forensic Scientists

Society of Automotive Forensic Examiners

American Board of Forensic Examiners



**EXHIBIT B**

**Sgt. Paul F. Letsche Jr., #1357**  
**Massachusetts State Police**

**CURRENT POSITION**

- Division of Field Services/ H-Troop/ State Police Barracks Framingham  
February 2006 to Present

**QUALIFICATIONS**

- Certified Massachusetts Fire Investigator on December 5, 1998 by the Massachusetts Public Safety Fire Investigator Certification Coalition/ Massachusetts Firefighting Academy
- Certified IAAI Fire Investigator on July 16, 2003 by the International Association of Arson Investigator, Inc.

**DUTIES & RESPONSIBILITIES**

- Supervise and monitor troopers assigned
- Conduct roll calls, assign patrol routes, delegate tasks
- Review and approve reports
- Review and approve payroll

**FORMER POSITION**

- State Police Detective Sergeant/ Division of Investigative Services/ Fire & Explosion Investigation Section/ South Team Supervisor  
October 2004 to February 2006
- Massachusetts state Police Public Affairs Section  
January 2004 to October
- State Police Detective/ Division of Investigative Services/ Fire & Explosion Investigation Section/ District State Fire Marshal Plymouth County  
February 1993 to January 2004
- State Trooper/ Field Operations, Troops C& E  
December 1986 to February 93
- State Police Academy  
July 1986 to December 1986

## EDUCATION

- Construction Technology Certificate/ Don Bosco Technical High School  
Boston, MA  
September 1973 to June 1977
- Bachelor of Science in Marine Engineering/ Massachusetts Maritime Academy  
Buzzards Bay, MA  
September 1978 to May 1982
- Licensed Third Assistant Engineer Steam and Motor Vessel any Horsepower  
May 1982 to May 1988
- Marine Firefighting School/ Massachusetts Fire Academy Barnstable, MA  
Fall 1981
- U.S. Navy Firefighting School/ Norfolk, VA  
October 1987
- Master of Arts in Criminal Justice/ Anna Maria College Paxton, MA  
April 1989 to May 1990

## COURT QUALIFICATIONS

- Court Qualified as Expert Witness/ Fire Origin & Cause/ U.S. Federal Court/  
U.S. Vs Awon & St. Louis Docket # 95-10309-GAO  
April 1996
- Court Qualified as Expert Witness/ Fire Origin & Cause/ Norfolk County  
Superior Court/ Maria Fernandes vs. Arbella Ins. Co.  
September 1996
- Court Qualified as Expert witness/ Fire Origin & Cause/ District Court  
Stoughton, Norfolk County/ Nadia Jean-Michelle D/B/A Impeccable Beauty  
Unisex Saloon vs. Aetna Insurance Company  
January 1999
- Testified before the Plymouth County Grand Jury on numerous occasions
- Testified in Plymouth Superior Court regarding Double Homicide/ Arson Cs#  
93-117-2000-0103  
November 1995

## AWARDS & COMMENDATIONS

- Letter of Commendation from Bureau Commander regarding arrest and  
convictions for General alarm Fire in the Village Section of the City of  
Brockton November 13, 1996
- Certificate of Commendation for outstanding performance in the course of duty  
from Section Commander November, 1998

## **ORGANIZATIONS**

- Member of the Massachusetts Chapter of the International Association Of Arson Investigators
- Plymouth County Juvenile Firesetters Program
- Plymouth County Detectives Organization

## **TRAINING**

- 1-06/ Case Study-Everett Fire & NFPA 921 Review/ 6 Hrs Tested
- 11-05/ An Attorney's Approach to Fire Origin and Cause 7 CFI trainer Program/ 6 Hrs Tested
- 11-03/ Forensic Evidence/ Auburn, MA/ 6 Hrs Tested
- 9-03/ Heating Systems Fires/ Maynard, MA/ 6 Hrs Tested
- 4-03/ DNA, Blood & Fire Debris Analysis/ Boston, MA/ 8 Hrs Tested
- 1-03/ Fata. Fire & Explosion Scene Investigations/ Boston, MA/ 6 Hrs Tested
- 6-02/ Vehicle Fires, Fatal Fires and Abandoned Building Project/ Barnstable, MA/ 15 hrs Tested
- 5-02/ Incident Response to Terrorist Bombings Training Course/ New Mexico Tech (EMRTC) New Mexico/ 32 Hrs Tested
- 4-02/ Fire Investigation Course-Boston Fire Department/ Boston, MA/ 18 Hrs Tested
- 3-02/ Fire Scene Reconstruction and Documentation/ North Andover, MA/ 6 Hrs Tested
- 2-02/ Law Enforcement Response to WMD Incidents-Awareness Level, Department of Justice Louisiana State University/ Stow, MA/ 16 Hrs Tested
- 2-02/ Expert Testimony and NFPA 921/ Stow, MA/ 8 Hrs
- 1-02/ Post Fire Investigation of Electrical Components/ Boston, MA/ 6 Hrs tested
- 12-01/ Ecc-Terrorism seminar/ Marlboro, MA/ 8 Hrs
- 11-01/ Basic Fire Science and Fire Investigation/ Franklin, MA/ 12 Hrs Tested
- 9-01/ Marine Fire Fighting Task Force Level 3-Technician Course/ Boston, MA/ 8 Hrs
- 3-01/ ISE Fire Causes Involving Residential Heating Systems/ Stow, MA/ 4 Hrs
- 1-01/ Blood Born Pathogens/ Stow, MA/ 3 Hrs
- 1-01/ Forensic Photography/ Boston, MA/ 6 Hrs Tested
- 10,11-00/ Juvenile Firesetter Intervention Program/ Framingham, MA/ 15 Hrs
- 9-00/ Marine Fire Fighting Task Force Level-2 Operations Course/ Boston, MA/ 8 Hrs
- 6-00/ Structural Hazards/ Stow, MA/ 3 Hrs
- 3-00/ Actual case uses of Fire Modeling, Lessons learned from major cases/ North Andover, MA/ 6 Hrs Tested

- 1-00/ Terrorism, Fraud legal issues/ Boston, MA/ 6 Hrs Tested
- 11-99/ Electrical Fires, Vehicle Fires/ Auburn, MA/ 6 Hrs Tested
- 10-99/ Hazardous Materials, First Responder Operational/ New Braintree, MA/ 24 Hrs
- 4-99/ Bomb Threat Protocol/ Stow, MA/ 6 Hrs
- 3-99/ Non-verbal clues to detect deceit/ Intro of InterFire Interactive CD-Rom for Fire Investigation/ North Andover, MA/ 6 Hrs Tested
- 2-99/ Search Warrants/ Stow, MA/ 6 Hrs
- 12-98/ Interview and Interrogation/ Stow, MA/ 8 Hrs
- 11-98/ Investigation of Fire protection systems, Hazards at the Fire Scene/ Norwood, MA/ 6 Hrs Tested
- 10-98/ NFPA 921 Fire and Explosion Investigations/ Stow, MA/ 8 Hrs
- 9,10-98/ Post-Blast Investigation/ ATF/ Franklin, MA/ 16 Hrs Tested
- 9-98/ Explosives/ Maynard, MA/ 6 Hrs Tested
- 6-98/ Sprinkler Systems/ Stow, MA/ 6 Hrs
- 6-98/ Hazmat Training/ Stow, MA/ 6 Hrs
- 5-98/ Children and Fire- A Bad Match/ Plymouth, MA/ 6 Hrs Tested
- 4-98/ Juvenile Fire Setters / Stow, MA/ 8 Hrs
- 3-98/ Statement Analysis, scientifically Based Fire Investigative Techniques/ Auburn, MA/ 12 Hrs Tested
- 1-98/ Spoliation of Evidence, NFPA 921/ Boston, MA/ 6 Hrs Tested
- 11-97/ Advanced Arson/ New Braintree, MA
- 11-97/ Propane Fires & Explosions, Using NFPA 921/ Auburn, MA/ 6 Hrs Tested
- 11-97/ Advanced Arson Program/ New Braintree, MA/ 40 Hrs Tested
- 8-97/ Post Blast Investigators School/ FBI Academy/ 40 Hrs Tested
- 5-97/ Mock Trial & Trial Preparation/ Barnstable, MA/ 12 Hrs Tested
- 3-97/ Investigation of Fatal Fires/ Boston, MA/ 6 Hrs Tested
- 1,2-97/ Basic Arson/ Fire Photography/ Stow, MA/ 16 Hrs
- 1-97/ Computer Modeling and Design/ Foxboro, MA/ 5.5 Hrs Tested
- 12-96/ Fire and Arson Investigation/ Mass. Fire Academy/ 40 Hrs Tested
- 11-96/ Electrical Fires/ Auburn, MA/ 5.5 Hrs Tested
- 10-96/ Advanced Reid Interviewing and Interrogation/ E. Boston, MA/ 16 Hrs
- 10-96/ Initial Fire Investigation/ National Fire Academy (Regional Delivery)/ 40 Hrs Tested
- 9-96/ Safety & survival on the Fire Ground & Wood Frame Building Collapse/ Worcester, MA/ 5 Hrs Tested
- 9-96/ Reid Interviewing and Interrogation/ New Braintree, MA/ 24 Hrs
- 5-96/ Appliance Failures and Fires/ Barnstable, MA/ 11 Hrs Tested
- 3-96/ Fire and Arson Investigation/ Stow, MA/ 28 Hrs Tested
- 3-96/ Issues and Ethics in Fire Investigations/ Boston, MA/ 6 Hrs Tested
- 1-96/ Making a successful Civil Case, Developing and Finding Profiles with Public Information and Surveillance/ 6.5 Hrs Tested

- 5-95/ Fire dynamics, Case Preparation, defending Civil Cases, Flashover Vs Flammable Liquid burn Patterns & Environmental Considerations/ Barnstable MA/ 16.5 Hrs Tested
- 5,6-95/ Basic Arson & Fire Photography/ Stow, MA/ 16 Hrs
- 4-95/ Basic fire and arson Investigation, Fire Marshal's Office/ Boston, MA/ 40 Hrs Tested
- 3-95/ Marine Fires, Case Preparation, Metallurgy, Spalling and Wood Burning, North Andover, MA/ 11 Hrs Tested
- 2-95/ Juvenile Firesetter Intervention Training/ Middleboro, MA/ 16 Hrs
- 1-95/ Expert witness Testimony, Court room demeanor, Investigations of Large Loss Fires and the Black Hole/ Boston, MA/ 6 Hrs Tested
- 12-94/ Arson Investigation and Prosecution/ Hampden County District Attorney's Office/ Springfield, MA/ 10.5 Hrs Tested
- 11-94/ Basic & advanced Kinesic Interview & Interrogation Techniques, The Seattle serial Arson Case, The sno-Ring Arson Task Force/ Mansfield, MA/ 12 Hrs Tested
- 9-94/ Bringing Your evidence from scene to Court, defending Defense Tactics in an Arson Trial, Understanding Spontaneous Heating and Ignition/ Wachuset MA/ 5.5 Hrs Tested
- 3-94/ Juvenile Fire Setter, Automatic Sprinkler Systems/ N. Andover, MA/ 6 Hrs Tested
- 12-93/ Arson Investigation and Prosecution/ Hampden County District Attorney's Office/ Springfield, MA/ 10.5 Hrs Tested
- 12-93/ Arson Fraud Investigation Seminar/ Braintree, MA/ 16 Hrs
- 10-93/ ATF Post Blast Investigation/ Fort Devens/ 24 Hrs
- 7-93/ Arson Seminar, Saint Anselm College/ Manchester, NH/ 40 Hrs Tested
- 5-93/ Fatal fire, Cause & Origin, Insurance and the "Civil Case", Interfacing with the Public sector, ATF Asset Forfeiture & Report Writing, NFPA major Fire Cases/ Mansfield, MA/ 22 Hrs Tested
- 5-93/ Accelerant Evidence Collection/ Holeyoke, MA/ 8 Hrs
- 2-93/ Basic Investigation/ New Braintree, MA/ 40 Hrs



---

# INTERNATIONAL ASSOCIATION OF ARSON INVESTIGATORS, INC.

---

12770 Boenker Road

St. Louis, MO 63044

Telephone: 314/739-4224

Fax: 314/739-4219

---

August 26, 2003

Paul Francis Letsche, Jr., IAAI-CFI  
Massachusetts State Police  
P.O. Box 1025  
State Road  
Stow, MA 01775

RE: CFI Testing Status

Dear Paul

Congratulations!

You have successfully passed the International Association of Arson Investigators examination to become a Certified Fire Investigator by the Association.

Enclosed, please find your certification and wallet card designating this professional recognition.

Your certification will expire on 7/16/08 unless you have met the requirements for recertification and have so notified the Certification Committee by submission of supporting documentation.

Again, congratulations on your achievement.

Sincerely,

*R. Kirk Hankins*

R. Kirk Hankins, IAAI-CFI, Chair  
International Certification Committee

RKH/mcs

Enclosures





ARGEO PAUL CELLUCCI  
GOVERNOR

JANE SWIFT  
LIEUTENANT GOVERNOR

JANE PERLOV  
SECRETARY

*The Commonwealth of Massachusetts*  
*Executive Office of Public Safety*  
*Massachusetts Public Safety Fire Investigator Coalition*

*State Road - Post Office Box 1025*

*Stow, Massachusetts 01775*

*(978) 567-3200 Fax: (978) 567-3200*

February 23, 1999

Mr. Paul F. Letsche Jr.  
9 Ox Bow Lane  
Randolph, Massachusetts 02368

Dear Candidate:

On behalf of the Massachusetts Public Safety Fire Investigator Certification Coalition, it is my pleasure to inform you that you have passed the Fire Investigator certification examination, and you are now certified as a Fire Investigator in the Commonwealth of Massachusetts.

Your certificate is enclosed. At a future date, you will receive information regarding recertification requirements. In addition, you may use the following title after your name which designates your certification achievement; Mr. Paul F. Letsche Jr., Massachusetts Certified Fire Investigator.

This certification indicates that you have successfully demonstrated the knowledge, skills, and/or abilities required by the MPSFICC for the level of Fire Investigator. The objectives adopted for this level are those found in the National Professional Qualifications System Standard 1033, Fire Investigator.

Your certificate is valid for *five years* from the date of issue.

Congratulations on this achievement.

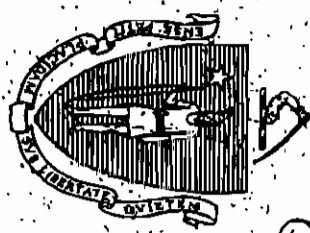
Sincerely,

William M. Hollick, Director  
Massachusetts Firefighting Academy  
Staff Liaison to the Massachusetts Public Safety Fire Investigator Certification Coalition

Enclosure: Certificate  
cc: Chief of Department



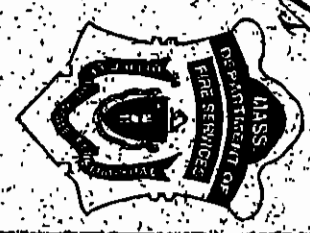




*The Commonwealth of Massachusetts*

*Department of Fire Services*

*Office of the State Fire Marshal*



# DELEGATION OF AUTHORITY

In accordance with the provisions of Section 4 of Chapter 148 of the General Laws, Ter. Ed. (as amended)

I hereby delegate the authority therein vested in me to:

**Tpr. Paul F. Letsche**

**Fire and Explosion Investigation Unit**

**Office of the State Fire Marshal**

Given under my hand at Slow, Massachusetts, this 10th day of January, 1995.

General Laws, Chapter 148, Section 4.  
The marshal, as inspector, the head of the fire department or any person to whom the marshal or the head of the fire department may delegate the authority, may, in the performance of the duties imposed on him by the laws of the Commonwealth, or of any rule or regulation of the board of fire-retarding regulations, established under section four of chapter ninety-two D, in this chapter referred to as the board, or any order of the marshal or head of the fire department, enter at any time and place any building or other premises, or any place connected with the building or premises, without being hindered or obstructed in the performance of his duties.  
The marshal or the head of a fire department to whom he may delegate authority, shall make an inspection, every three months of fire stations as defined by the state building code, fire-retarding and under the supervision of the department of public health, or licensed by the department of public health, and shall make a report of such inspection to each such department or fire-retarding unit to which he is assigned for this purpose. Said marshal or head of a fire department shall also make an inspection every three months of the premises specified in subchapter 1 of chapter 148C under chapter one hundred and forty.

Stephen D. Coan, State Fire Marshal

MORRISON, MAHONEY & MILLER

COUNSELLORS AT LAW

Lawrence A. Dugan  
617-439-7572

250 SUMMER STREET  
BOSTON, MASSACHUSETTS 02210-1181  
617-439-7500  
FACSIMILE 617-439-7390

MASSACHUSETTS  
BOSTON  
RAYNHAM  
SPRINGFIELD  
WORCESTER  
YARMOUTH PORT  
RHODE ISLAND  
PROVIDENCE  
CONNECTICUT  
HARTFORD

MICHIGAN  
GRAND RAPIDS  
SOUTHFIELD  
CALIFORNIA  
SAN FRANCISCO  
NEW YORK  
NEW YORK  
ENGLAND  
LONDON

October 2, 1997

Trooper Paul Letsche  
Massachusetts State Police - Middleborough Barracks  
326 West Grove Street  
Middleborough, MA 02346

Re: Expert Witness Qualification

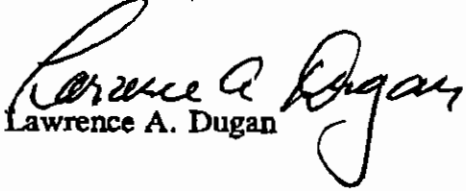
Dear Trooper Letcher

This will certify that you were found qualified by the Norfolk Superior Court, Judge John J. O'Brien presiding, to testify as an expert witness in the area of fire cause and origin investigation and permitted to offer to the jury your opinion as to the probable origin and cause of the fire that occurred on December 25, 1993 at 7 West Alden Avenue, Randolph, Massachusetts. In that action, Manuel Fernandez v. Arbella Mutual Insurance Company, Docket No. 95-843, you were presented as a witness under subpoena for the defendant insurer.

If you have any questions, or if we may be of further assistance, please feel free to telephone.

Very truly yours,

MORRISON, MAHONEY & MILLER

  
Lawrence A. Dugan

LAD:rmc



**U.S. Department of Justice**

*United States Attorney  
District of Massachusetts*

---

1003 J.W. McCormick Building P.O. & Courthouse  
Boston, Massachusetts 02109

October 7, 1997

Massachusetts State Police Trooper Paul Letsche  
Massachusetts State Police  
P.O. Box 1025  
State Road  
Stow, MA 01775

Dear Trooper Letsche:

This letter will serve as confirmation that in April, 1996, in United States District Court in Boston, Massachusetts, you were found qualified by District Court Judge George O'Toole as an expert in the cause and origin of fires. Accordingly, you were permitted by Judge O'Toole to testify in that capacity in the matter of United States v. Fred Awon and James St. Louis, No. 95-10309-GAO, an arson prosecution arising out of an investigation which you conducted in conjunction with the Brockton Fire Department and the Bureau of Alcohol, Tobacco, and Firearms.

Very truly yours,

DONALD K. STERN  
United States Attorney

By:

  
James Lang  
Assistant U.S. Attorney



08/13/2007 00:05 FAX 15088202202

State Police Framingham

DEC-28-98 04:57 AM

P. 82

THE COMMONWEALTH OF MASSACHUSETTS

TRUE COPY ATTEST:

TO: Trooper Paul F. Letsche, Jr.  
State Fire Marshall's Office  
State Road  
Stow, MA

*Lawrence E. Hartnett Jr.*  
Constable of Stow

You are hereby commanded, in the name of the Commonwealth of Massachusetts, to appear before the DISTRICT COURT holden at STOUGHTON, NORFOLK COUNTY on Tuesday, the 5th day of January, 1999 at 9:00 a.m. and from day to day thereafter, until the action hereinafter named is heard by said Court, to give evidence of what you know relating to the civil action of NADIA JEAN-MICHELLE d/b/a IMPECCABLE BEAUTY UNISEX SALON vs. AETNA INSURANCE COMPANY

Hereof fail not, as you will answer your default under the pains and penalties in the law in that behalf made and provided.

Dated at Maynard the 29 day of December, 1998.

*Lawrence E. Hartnett Jr.*  
NOTARY PUBLIC

Docket # 97- 15 RM 185

LAWRENCE E. HARTNETT JR.  
Notary Public  
My Commission Expires June 10, 1999

**EXHIBIT C**

10/22/07 15:29 FAX 617 585 7528  
 OCT. 22. 2007 3:24 PM FAX 971 AMPDEN CTY DIST ATTORNEY  
 /10/2003 18:52 13535

NO. 2154

002/008  
 P. 2

P.O. Box 1025  
 State Road  
 Stow, MA 01773

Phone 878/587-3342  
 E-mail  
 Michael.Mazza@state.ma.us

# Michael S. Mazza

## Functional summary

Resume in support of Trooper, Fire & Explosion Investigation Section

## Employment

[ 1986-Current ] Massachusetts State Police

### Trooper

- December 1986-February 1987, SP Cheshire
- February 1987-July 1989, SP Lee
- July 1989-1992, Berkshire County CPAC, Berkshire County Fire Marshal Representative
- 1992-1993, Hampden County CPAC, Hampden County Fire Marshal Representative
- 1993-Present, Fire and Explosion Investigation Section, Hampden County Fire Marshal Representative

## Education

Present, Masters Program, Western New England College, Springfield, Ma.

June 2003, Western New England College, Springfield, Ma., Bachelor's Degree-Criminal Justice

June 1984, Holyoke Community College, Holyoke, Ma., Associate's Degree-Business Administration

## Professional memberships

Massachusetts Chapter I.A.A.I., Certified Fire Investigator

## Awards received

April 1, 1991, Letter of Commendation, Certificate of Appreciation, New York State Police

February 6, 1998, Department of State Police, Bureau Commander's Commendation

September 1, 1998, Department of State Police, Bureau Commander's Commendation

1996, Massachusetts State Police, Superintendent's Unit Citation, Gang Task Force

May 1999, Hampden County Law Enforcement Officer of the Year

December 1999, Massachusetts State Police, F&EIS, Certificate of Commendation

April 1999, Massachusetts State Police, F&EIS, Certificate of Commendation

June 1999, Massachusetts State Police, F&EIS, Certificate of Commendation

August 1999, Massachusetts State Police, F&EIS, Certificate of Commendation

March 22, 2000, Department of State Police, Division Commander's Commendation

May 7, 2000, The Roman Catholic Diocese Of Worcester, Distinguished Service Award

**Teaching Summary**

Instructor, Massachusetts State Police Academy, New Braintree, Ma.

Instructor, Massachusetts State Fire Academy, Stow, Ma.

Instructor, F.B.I. Academy, Quantico, Va.

Instructor, Massachusetts Criminal Justice Training Council

Guest Lecturer, Holyoke Community College, American International College, Western New England College, Worcester Polytechnical Institute, Westfield State College

**Canine Certification**

1991, Accelerant Detection Canine Training, Maine State Police, Maine Criminal Justice Training Council

1992, Recertification, Accelerant Detection Canine Training, Maine State Police

1993, Recertification, Accelerant Detection Canine Training, Maine State Police

1994, Recertification, Accelerant Detection Canine Training, Maine State Police

October 18, 1995, Canine Accelerant Detection Recertification, Bureau of Alcohol, Tobacco and Firearms, Meriden CT

October 21, 1995, Canine Accelerant Detection Recertification, Connecticut State Police, Meriden CT

September 1996, Canine Accelerant Detection Recertification, Bureau of Tobacco, Alcohol and Firearms

August 1997, Canine Accelerant Detection Recertification, Bureau of Alcohol, Tobacco and Firearms

OCT. 22. 2007 3:24 PM FAX 97-1AMPDEN CTY DIST ATTORNEY

12/18/2003 10:52 413535-1964

SPM) MULTYME

NO. 2154 . P. 4 004/006 000

MAY 1998, Certificate of Training, Accelerant Detection Dog Team, Connecticut State Police and the Federal Bureau of Alcohol Tobacco and Firearms

October 1998, Canine Accelerant Detection Recertification, Connecticut State Police

October 1998, Accelerant Detection Canine Recertification, Bureau of Alcohol, Tobacco and Firearms, Tucson, AZ

March 1999, Accelerant Detector Canine Training, North Carolina Department of Justice State Bureau of Investigation

August 5-7, 1999, CADA National Conference & Proficiency Testing, Canine Accelerant Detection Association, Apopka, Florida

September 1999, Canine Accelerant Recertification, Connecticut State Police

October 1999, Accelerant Detection Canine Recertification, Bureau of Alcohol, Tobacco and Firearms, Myrtle Beach, South Carolina

October 2000, Accelerant Detection Canine Recertification, Bureau of Alcohol, Tobacco and Firearms, Van Nuys, CA

December 2000, Canine Accelerant Detection Recertification, Connecticut State Police

November 2001, Canine Accelerant Detection Recertification, Connecticut State Police

April 2002, Accelerant Detection Canine Recertification, Bureau of Alcohol, Tobacco and Firearms, Buffalo, NY

December 2002, Canine Accelerant Detection Recertification, Connecticut State Police

December 2002, Accelerant Detection Canine Team Recertification, Massachusetts State Police, Massachusetts State Police Crime Lab

March 30, 2003-April 7, 2003, Accelerant Canine Recertification, Bureau of Alcohol, Tobacco and Firearms, Las Vegas, NV

September 17, 2003, Canine Accelerant Detection Recertification, Connecticut State Police



**Professional  
Development**

November 1988, Homicide Investigation, Poughkeepsie, New York

March 28 to 31, 1988, 3<sup>rd</sup> Annual Fire Investigators Seminar, R.I. State Fire Marshals Office & R. I. Chapter I.A.A.I., Roger Williams College

May 1988, Basic Arson Investigation, Massachusetts Criminal Justice Training Council

November 27-December 1, 1989, Homicide Investigation, Massachusetts State Police

March 23, 1990, Ritualistic Crimes, Mt. Wachusett Community College

August 31 1990, Fire Arson Investigation, National Fire Academy, Emmitsburg MD.

September 27, 1990, Documenting the Fire & Crime Scene, Evidence Collection Analysis, Massachusetts Chapter IAAI

March 14, 1991, Recovering Physical Evidence \* Fire & Explosion Litigation\* Electrical Fire Scene Investigations, Massachusetts Chapter IAAI

June 17-21, 1991, Arson Seminar, Saint Anselm College, Manchester, NH

January 14, 1992, LEAPS/CJIS Training

March 19, 1992, "The Paper Chase", Massachusetts Chapter IAAI

November 18, 1992, Reverse Conspiracy, Gas & Oil Heating Equip. Fires, Massachusetts Chapter IAAI

January 21, 1993, NFPA 921, The Flammability of Furniture and Mattresses, Massachusetts Chapter IAAI

January 29, 1993, Fire & Arson Photography, Hampden County District Attorney's Office

March 18, 1993, Kinesthetic Interview Technique, Massachusetts Chapter IAAI

May 4, 1993, Accelerant Evidence Collection, Holyoke Fire Department

June 28-July 2, 1993, Arson Seminar, Saint Anselm College, Manchester, NH

September 18, 1993, Understanding and Investigating Chimney Fires,

"Coconut Grove Revisited", Massachusetts Chapter IAAI

October 12-14, 1993, Post Blast Investigation, Bureau of Alcohol, Tobacco and Firearms

November 18, 1993, How to Handle Bomb Threats, Explosive Devices & Bomb Scene Investigations, World Trade Center Bombing, Massachusetts Chapter IAAI

December 2-3, 1993, Arson Investigation & Prosecution, Hampden County District Attorney's Office, Massachusetts State Fire Marshal's Office

May 20, 1994, Live Burn, Development and Extinguishment & Evidence Collection, The City of Holyoke, Office of the Chief

March 3, 1995, Crime Scene Analysis Seminar, Hampden County District Attorney's Office

June 1-2, 1995, Fire Dynamics, Case Preparation, Defending Civil Cases, Flashover vs Flammable liquid burn patterns & Environmental Considerations, Massachusetts Chapter IAAI

May 30 & June 6, 1995, Basic Arson/ Fire Photography, Massachusetts State Police-Fire Marshal's Office

November 10, 1995, Live burn to study fire growth & Suppression, The City of Holyoke Fire Department, Office of the Chief

May 3-10, 1996, Problem Solving Leadership For Quality Driven Performance-Module #1, Massachusetts State Police

May 15-16, 1996, Appliance Failures and Fires, Massachusetts Chapter IAAI

May 20-24, 1996, Arson Seminar, Saint Anselm College, Manchester, NH

October 24-25, 1996, Advanced Course on The Reid Technique of Interviewing and Interrogation, John E. Reid and Associates

November 21, 1996, Electrical Fires, Massachusetts Chapter IAAI

January 23, 1997, Computer Modeling and Design, Massachusetts Chapter IAAI

March 20, 1997, Investigation of Fatal Fires, Massachusetts Chapter IAAI

April 24, 1997, Arson Investigation & Prosecution, Office of Attorney General Scott Harshbarger

May 15-16, 1997, Mock Trial-Trial Preparation, Massachusetts Chapter IAAI

May 19-23, 1997, Arson Seminar, Saint Anselm College, Manchester, NH

July 28-August 1, 1997, Post Blast Investigation School, FBI Academy, Quantico, Virginia

**EXHIBIT D**

59 Horse Pond Road  
Sudbury, Massachusetts 01776  
Phone (508) 358-3220

## John E. Drugan

---

### Experience

1984-Present Department of State Police – Crime Laboratory, Sudbury, Ma.

#### Senior Chemist

Employed as a Senior Chemist in the Arson and Explosive Unit of the Crime Laboratory. Supervisory position requires the overseeing of two chemists and laboratory operations include the maintenance of stock control, calibration, operation and maintenance of equipment, QA\QC duties and implementation of established laboratory protocols. Laboratory examination includes the analysis of recovered evidence from crime scenes for explosives\explosive residues, explosive device reconstruction, gunshot residues and the presence and identification of ignitable liquids. Trained and experienced in Crime Scene Investigations for the recovery and analysis of trace evidence which may include hairs, fibers, body fluids, gunshot residues, paints, explosive components, explosive residues, and other related materials. Trained and experienced in drug analyses and toxicological testing of biological fluids. Provide expert witness testimony as required.

Instrumentation proficiency include G.C./M.S., U.V. Spectroscopy, SEM-EDAX, F.T.I.R., MICRO-F.T.I.R., G.C.-FID, Light Microscopy and a variety of wet chemical methods.

1984 The Gillette Company North Andover, Ma.

#### Chemical Technician

Employed on a part-time basis as a Chemical Technician in Quality Control. Duties included testing both finished and unfinished products for predetermined chemical specification levels..

### Education

1980-1984 Merrimack College, North Andover, Ma. Bachelor of Science, Chemistry.

1974-1978 Austin Preparatory School, Reading, Ma. College Course

### Interests

Fishing, Hunting, Weight Training and Golf.

### References

Furnished upon request.

---

## **CURRICULUM VITAE**

---

**TO:** WHOM IT MAY CONCERN  
**FROM:** JOHN E. DRUGAN, SENIOR CHEMIST  
**DATE:** 11/2/2007

---

This letter is to inform you of my current qualifications as a Senior Chemist in the Arson and Explosive Unit of the Massachusetts State Police Crime Laboratory:

1. Laboratory analysis of over 8750 fire and explosives related crimes and on-site investigation of over 150 major crime scenes during my twenty three years of service in this field.
2. Laboratory analysis of over 100 Gunshot residue cases.
3. Flammability testing of approximately 10,000 decorative fabrics and/or materials in accordance with 527 CMR 21.
4. Current member of the Special Crime Scene Response Unit for the Massachusetts State Police trained to respond to potential terrorist attacks involving the use of WMD and/or conventional explosives. Duties include the documentation, collection and analysis of evidence recovered at crime scenes wearing level A, B or C protection.
5. Expert witness testimony in District, Superior and Federal Courts in Massachusetts, Maine and Connecticut in excess of 225 arson/explosive related matters, gunshot residue analysis and crime scene examinations.
6. Completed "Arson Accelerant Detection Training Course" at the Bureau of Alcohol, Tobacco and Firearms Laboratory, Rockville, Maryland in March 1985.
7. Completed "Instrumental Analysis of Explosives and Explosive Training Course" at the Federal Bureau of Investigation Academy, Quantico, Virginia in May 1989.
8. Completed "Scanning Electron Microscopy School" at AMRAY, Bedford Massachusetts in April 1990.
9. Instructor at "Arson Investigation and Prosecution" seminar sponsored by Hamden County District Attorney's Office and Massachusetts State Fire Marshal's Office in December 1993.
10. Attended "International Symposium of the Forensic Aspects of Arson Investigations" sponsored by the Forensic Science Training Unit – FBI Laboratory at George Mason University, Fairfax, Virginia in August 1995.

11. Completed "Post-blast Explosives Investigation School" sponsored by the Bureau of Alcohol, Tobacco and Firearms at the Massachusetts State Police Academy, New Braintree, Massachusetts in November 1995.
12. Completed "Advanced Fire Debris Analysis Course" sponsored by the Bureau of Alcohol Tobacco and Firearms at the National Forensic Science Training Center in St. Petersburg, Florida in September 1996.
13. Instructor at "Arson Investigation and Prosecution" seminar sponsored by the Massachusetts Attorney General's Office in April 1997.
14. Completed "Basic Bloodstain Pattern Analysis" taught by Henderson Forensics at the Massachusetts State Police Academy, New Braintree, Massachusetts in March 1998.
15. Completed "Scanning Electron Microscopy and Elemental Analysis" at McCrone Research Institute, Chicago, Illinois in June 1999.
16. Attended Alcohol Tobacco and Firearms (ATF) Accelerant Detection Canine Certification Class at Myrtle Beach, South Carolina in October 1999.
17. Completed "Microscopy F.T.I.R. Analysis" class conducted by Nicolet Instruments at Massachusetts State Police Crime Laboratory, Sudbury, Massachusetts in March 2000.
18. Participated in "Fire Dynamics, Flashover and Modern Fire Investigation" at Cape Cod Community College, Barnstable, Massachusetts, sponsored by the Massachusetts Chapter of the International Association of Arson Investigators in June, 2000.
19. Completed "Advanced Crime Scene Investigation Course" at the Metropolitan Police Institute, Miami, Florida in June, 2000.
20. Instructor at "Children and Fire VII" at the Sheraton Tara, Framingham, Massachusetts, sponsored by the Massachusetts Coalition for Juvenile Firesetter Intervention Program in October, 2000.
21. Completed "Advanced Crime Scene Technology III Course", at Northwestern University, Evanston, Illinois in November, 2000.
22. Completed "Federal Bureau of Investigation Post Blast Investigators School" at Fort Devens, Massachusetts in December, 2000.
23. Appeared on Animal Planet series entitled "K-9 TO 5" which featured arson accelerant detection k-9 "Lucy" and Fire Investigator\ K-9 handler Trooper Paul Horgan.
24. Instructor at "Children and Fire VIII" at the Sheraton Tara, Framingham, Massachusetts, sponsored by the Massachusetts Coalition for Juvenile Firesetter Intervention Program in November, 2001.
25. Attended "Management and Staff Training Program" at Massachusetts State Police Headquarters, Framingham by the University of Massachusetts Donahue Institute in January 2002.



26. Attended the American Academy of Forensic Science Meeting in Atlanta, Ga. In February, 2002.
27. Completed "Emergency Response to Terrorist Bombings-Technical Level Course" at New Mexico Tech Energetic Materials Research and Testing Center, Socorro, New Mexico sponsored by the United States Department of Justice in September 2002.
28. Completed "Weapons of Mass Destruction Chemistry Workshop" at the Massachusetts State Fire Academy, Stow, Massachusetts in November 2002.
29. Completed "Hazardous Materials Response for the Crime Scene Technician" at the State Fire Academy, Stow, Massachusetts in January 2003. Trained in the use of Level "A", level "B" and level "C" protective suits for crime scene processing involving weapons of mass destruction.
30. Attended "Homeland Security Conference on Preparing for and Managing Terrorism and Weapons of Mass Destruction" sponsored by the Department of Fire Services and Executive Office of Public Safety at the Westford Regency Inn and Conference Center, Westford, Massachusetts in May 2003.
31. Participated in one day mock crime scene involving weapons of mass destruction at the Alewife MBTA Station, Cambridge, Ma on June 29, 2003. Duties involved donning level "A" gear, entering crime scene within the MBTA station and collection of body fluids for future examination.
32. Instructor at "Children and Fire X" at the Sheraton Tara, Framingham, Massachusetts, sponsored by the Massachusetts Coalition for Juvenile Firesetter Intervention Program in November, 2003.
33. Attended "TWGFEX 2003 Symposium on Fire and Explosion Debris Analysis and Scene Investigation" sponsored by the Department of Justice-National Institute of Justice and hosted by the University of Central Florida in November, 2003.
34. Completed buccal DNA collection training at the Massachusetts State Police Crime Laboratory in December, 2003.
35. Completed "Large Vehicle Post Blast Class" sponsored by the Federal Bureau of Investigation at the China Lake Naval Air Weapons Station in Ridgecrest, California in January, 2004.
36. Attended the Joint Meeting of the Southern, Midwestern, Mid-Atlantic and Canadian Association of Forensic Scientists in September, 2004.
37. Completed "The Analysis and Investigative value of Pipe, Pipe Fittings and Explosive Fillers in Improvised Explosive Devices Workshop" at the joint meeting of Southern, Midwestern, Mid Atlantic and Canadian Associations of Forensic Scientists in Orlando, Florida in September, 2004.



38. Completed "FTIR, Microprobe and FTIR Microscopy Applications to Trace Evidence Workshop" at the joint meeting of Southern, Midwestern, Mid Atlantic and Canadian Associations of Forensic Scientists in Orlando, Florida in September, 2004.
39. Instructor participating in the bi-yearly "Advanced Arson Investigators Class" conducted at the Massachusetts Fire Academy, Stow, Ma. beginning in 1998 and continuing to present day.
40. Instructor of "Forensics" class for undergraduate students at Lasell College in Newton, Mass during the Fall semester of 2004.
41. Completed "40 Hour Hazardous Waste Operations and Emergency Response Training" at the Massachusetts Fire Academy in Stow, Mass. and Federal Bureau of Investigations Emergency Response Team Headquarters in Wilmington, Mass in February, 2005.
42. Attended "Gunshot Residue Symposium" at the FBI Academy in Quantico, Virginia in May, 2005.
43. One of several instructors participating in "Crime Scene Management" class at MPTC Boylston Regional Police Academy, Boylston, Mass in June, 2005.
44. Responded as a member of the Massachusetts State Police Special Crime Scene Response Unit to a one day exercise involving a mock weapon of mass destruction (explosive detonated on tanker truck and suicide bomber in a truck) at Green Hill Park, Worcester on September 17, 2005 with the following agencies: FBI, National Guard CST Unit, Massachusetts Hazardous Materials Response Team, Massachusetts Emergency Management Agency. Duties involved the collection of evidence and documentation of crime scene in level "B" gear.
45. Attended one day "Explosive Training for Prosecutors" class at Fort Devens, Massachusetts hosted by the FBI, ATF and Massachusetts State Police on October 5, 2005.
46. Attended Massachusetts State Police-Office of the State Fire Marshal Accelerant Detection K-9 Re-Certification seminar at the Massachusetts Military Reservation, Barnstable County Sheriffs Department, Cape Cod Massachusetts in October, 2005.
47. Instructor at "Children and Fire XII" at the Sheraton Tara, Framingham, Massachusetts, sponsored by the Massachusetts Coalition for Juvenile Firesetter Intervention Program in November, 2005.
48. Attended one day training at JEOL USA INC. for the use of the Denton Vacuum Desk IV sputter coater on December 23, 2005.
49. Presenter at Metro Arson Investigators Meeting in February, 2006 which involved the MSP Arson and Explosive Units Role in the Investigation of the Fatal Package Bombing in Everett, Mass on January 20, 2000.

50. Attended one day training entitled "The Role of the Public Health Laboratory: Biological and Chemical Terrorism Preparedness and Response" at the State Laboratory Institute, Massachusetts Department of Public Health, Boston, Ma in February, 2006.
51. Completed "Indoor Post Blast Class" co-sponsored by the Federal Bureau of Investigation and Connecticut State Police at the Norwich State Hospital and Uncasville Connecticut in October, 2006.
52. Presenter at 6<sup>th</sup> Annual TWGFEX Symposium sponsored by the National Forensic Training Center-University of Central Florida and United States Department of Justice-National Institute of Justice at the Radisson Hotel in Orlando Florida on November 16<sup>th</sup>, 2006. Lecture entitled "A Fatal Package Bombing in Everett, Massachusetts".
53. Completed three day "Genesis Particle Analysis\Automated GSR Particle Analysis" at EDAX , Mahwah, New Jersey in May 2007.
54. Attended one day lecture and demonstration at the University of Rhode Island by Dr Jimmie Oxley on the manufacture of high explosives such as TATP, Methyl ethyl ketone peroxide, hexamethylene triperoxide diamine (HMTD) with common household products in May 2007.
55. Attended one day training seminar entitled "The Threat of Islamic Terrorism and the Strategic and Tactical Response" sponsored by the Israeli Police and Ministry of Public Security, Massachusetts State Police and Canton Police Department in June 2007.
56. Presenter entitled "Forensic testing and how to use it in the courtroom" at Massachusetts Continuing Legal Education (MCLE), Boston in October, 2007. Topic included gunshot residue analysis in the laboratory and the associated equipment utilized.
57. Instructor in excess of fifty on-site training sessions of personnel from Police, Fire and Prosecutors involving the MSP Crime laboratory-Arson and Explosive Unit operations, capabilities and general functions.
58. Recipient of Department of State Police – Bureau Commander's Commendation for "Dedication and Performance" in the Arson and Explosive Unit of the Massachusetts State Police Crime Laboratory in July 1997.
59. Recipient of "Certificate of Commendation" by the Massachusetts State Police Office of the State Fire Marshal- Fire and Explosive Unit for "Dedication and Hard Work in the Field of Arson Prosecution" in April 1999.
60. Recipient of "Certificate of Appreciation" by the Massachusetts State Police Office of the State Fire Marshal-Fire and Explosive Unit for "Dedication and Assistance in the Advanced Fire Investigation Course" in October 1999.
61. Recipient of "Certificate of Appreciation" by the Massachusetts Department of State Police, "In grateful recognition of the time and energy extended " in November 2004.

62. Contributing author of "A Pocket Guide to Accelerant Evidence Collection, First Second and Third Editions" which were sponsored by the International Association of Arson Investigators-Massachusetts Subchapter.
63. Current member of a national technical working group (TWG-FEX) sponsored by the United States Department of Justice – National Institute of Justice with the goal of creating a national guideline for the laboratory examination of fire and explosive related materials recovered from crime scenes.
64. Contributing author to "A Guide for Explosion and Bombing Scene Investigation" as a member of the national technical working group (TWG-BSI) sponsored by the United States Department of Justice – National Institute of Justice.
65. Co-author of "Medium Petroleum Distillates: These ignitable liquids may or may not be accelerants", Fire Findings Magazine, Vol. 5, No. 4, p. 1-3.
66. Mentor in Masters Student Internship program sponsored by Massachusetts State Police Crime Laboratory.

Respectfully yours,

John E. Drugan

Senior Chemist

Arson and Explosive Unit

Massachusetts State Police Crime Laboratory